

## SAFETY – External stakeholder’s comments and review document

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**EXPECTATIONS: Criteria for assessing the treatment of and conditions for women in prison**

<b><u>Courts, escorts and transfers</u></b>	
Women transferring to and from the prison are treated safely, decently and efficiently.	
<b><u>PRT Comments:</u></b>	
<ul style="list-style-type: none"> <li>- There need to be more explicit indicators regarding the transfer of information into prison, in advance or with the woman as she arrives, especially from liaison and diversion services (and Pre Sentence Reports), including information about any dependent children.</li> <li>- Information should be available for escort staff (PER) and escort staff should be recording any concerns. How is this information used by the receiving prison?</li> <li>- How are individual needs recognised and met? What individual needs are covered? How are different screenings/assessments joined up (for example, collation of health, education, social care and other screenings/assessments to get an holistic view? Is there a named person responsible for this and within what timeframe does this happen?</li> </ul>	
1	Women <b>travel in decent conditions</b> during escort and are treated with respect.
	<b><u>PRT Comments:</u></b> <ul style="list-style-type: none"> <li>- Have women been given the opportunity prior to transfer/transport to make necessary phone calls to/about dependent children (see Farmer Review)?</li> <li>- Are women still being transported with men?</li> <li>- Are women still being dropped off last?</li> <li>- Are women who are menstruating provided with sanitary products?</li> <li>- Are women who are pregnant treated with appropriate care?</li> </ul>
2	Women are <b>safe at all times</b> while under escort, and <b>individual needs are recognised</b> and given proper attention.
	<b><u>PRT Comments:</u></b> <p>More detail would be helpful on the importance of identifying and meeting women’s needs</p> <ul style="list-style-type: none"> <li>- Most points are worded in a way that assumes people’s needs have already been identified, and overlook the possibility that needs may be hidden, may change or arise later, after initial assessments</li> </ul>

3	Women <b>understand where they are going and what to expect</b> when they arrive
	<p><b><u>PRT Comment</u></b></p> <ul style="list-style-type: none"> <li>- Women should not have to wear prison clothing at all</li> </ul>
<p><b><u>Early days in custody</u></b>          Women are treated with respect and feel safe on their arrival into prison and for the first few days in custody. Women’s individual needs are identified and addressed, and they feel supported on their first night. During a woman’s induction she is made aware of the prison routines, how to access available services and how to cope with imprisonment.</p>	
<p><b><u>PRT Comments:</u></b></p> <ul style="list-style-type: none"> <li>- <b>How are individual needs recognised and met? (for example, how are ‘emotional issues’ identified? Para 9). What individual needs are covered? How are different screenings/assessments joined up (for example, collation of health, education, social care and other screenings/assessments to get an holistic view? And within what timeframe does this happen?</b></li> <li>- <b>Is information accessible? For example, Easy Read and audio/video formats?</b></li> <li>- <b>Are arrangements and safeguards in place to ensure access to/ continuity of medication for women post-reception?</b></li> <li>- <b>How is information about women’s needs built upon, rather than starting from scratch? (as in, not another assessment!)</b></li> <li>- <b>Timeframes between needs being identified and met</b></li> <li>- <b>Routine procedure for Care Act assessment and referrals, if needed (and arrangements to listen to the concerns of family members and ensure they are aware of referral routes)</b></li> <li>- <b>What arrangements are in place to recognise learning disabilities and autism</b></li> <li>- <b>What arrangements are in place to discuss the need for necessary adjustments for women with disabilities, so enabling them to access the prison regime on a fair and equal basis with other prisoners. For example, a woman with learning disabilities interviewed by a PRT colleague hadn’t been able to phone home because she didn’t understand the PIN system and didn’t like to ask for help. (NMR 5.2)</b></li> <li>- <b>Given the identified vulnerabilities of many foreign national women, and the risk that they may be victims of trafficking, what arrangements are in place to assess the need for interpreter and/or translation services, particularly for, and for these to be provided in a timely fashion?</b></li> </ul>	
4	Women feel and are <b>safe on their reception</b> into prison and for the first few days in custody.
	<p><b><u>PRT Comment:</u></b></p> <p><b>How does transfer of information into prison link up with safer custody? For example, if a woman is known to be vulnerable, what routine arrangements are in place to notify/involve safer custody?</b></p>

5	Women are <b>treated with respect on arrival</b> at the prison.
	<p><b><u>PRT Comments:</u></b></p> <p>Current indicator: Women entering the prison are searched thoroughly but sensitively by a member of the same sex. Religious/cultural needs are taken into account.</p> <p><b>Compare this with RTWP 19: ‘Where permitted at all, internal (body cavity) searches and strip searches should only be carried out if absolutely and legally necessary, and never on a routine basis’</b></p> <p><b>The relevant indicator under Expectation 22 reads:</b> Strip searching of women is intelligence-led and only carried out when deemed necessary. Authorisation is clearly recorded along with sound reasoning about why less intrusive alternatives could not be used.</p> <p><b>Searching on entry should be assessed on the same basis as Expectation 22 (intelligence-led; only when deemed necessary) and (RTWP 19) never routinely.</b></p> <p>Strip-searching women who have histories of sexual abuse risks re-traumatising them and we note the practice has been criticised by HMIP – eg in the last inspection of HMP Peterborough. Tightening up the indicator would help ensure that body searches are only conducted when justified by intelligence and “absolutely and legally necessary”.</p>
6	The <b>safety of women’s children and other dependents is assessed</b> and safeguarded.
	<p><b><u>PRT Comments:</u></b></p> <p><b>Could there be a provision for imprisonment to be delayed in order to make adequate arrangements for children? See RTWP 2:</b></p> <ul style="list-style-type: none"> <li>- Prior to or on admission, women with caretaking responsibilities for children shall be permitted to make arrangements for those children, including the possibility of a reasonable suspension of detention, taking into account the best interests of the children.</li> <li>- <b>Pregnant women as well as mothers/ women who have recently given birth should be given information about MBU’s and helped with making an application.</b> PRT has been in touch with a number of women who said they found out too late about the possibility of an MBU place.</li> </ul> <p>See also Lord Farmer’s Review <i>‘The Importance of Strengthening Female Offenders’ Family and other Relationships’</i>, Chapter 4, recommendations 17-33 – in particular recommendation 22 that HMIP “ensure the importance of family ties features prominently throughout the Expectations for women’s prisons”...</p>
7	Women <b>know what will happen next</b> and the sources of help that are available.
8	Women’s <b>needs are accurately assessed</b> on arrival and <b>timely action</b> is taken to address them. Officers ensure that individuals’ needs or immediate anxieties are addressed before they are locked away for the night.

	<p><b><u>PRT comment:</u></b></p> <p><b>Under Respect, Expectation 3, an indicator requires residential units to ensure that women have access to personal hygiene items and sanitary products. Should the same be said for reception? (RTWP, 5)</b></p>
9	<p>Practical and emotional <b>issues identified on arrival are followed up</b>, and induction to the prison takes place.</p>
<p><b><u>Safe and supportive relationships</u></b>  Safe and supportive relationships are encouraged. Everyone feels and is safe from victimisation (which includes verbal and racial abuse, theft, violence and assault or threats). Women are protected from victimisation through active and fair systems known to staff, prisoners and visitors, and which inform all aspects of the regime. Any sanctions on behaviour are applied fairly, transparently and consistently.</p>	
<p><b><u>PRT Comments:</u></b>  <b>This sets precisely the right tone for this expectation. All women are protected, victimisation is prevented through fair systems, and sanctions are consistent and transparent. Preventing victimisation is not only fundamental to safe and supportive relationships; it is also essential to prevent violence. The staff role (dynamic security) is central.</b></p>	
10	<p><b>Safe and supportive relationships between women</b> are encouraged which enable them to feel and be safe from violence and victimisation from other prisoners and staff (which includes verbal and racial abuse, threats of violence and assault).</p>
<p><b><u>PRT Comments:</u></b>  <b>Indicator – Women understand this strategy and know where they can get help to report fear, victimisation, or violence.</b>  <b>Add indicator:</b>  <b>Mechanisms for resolving conflicts among women are easily accessed by all (with adjustments made if/ as necessary). (NMR, 38.1)</b></p> <p><b>Comment: The added indicator provides a clear outcome which would strengthen the indicator that women know where they can get help to resolve conflicts. See further, Security, expectation 22.</b></p> <p><b>Add indicator:</b>  <b>Staff are alert to conflicts among women and are confident and properly trained to intervene. (NMR 76.1-c)</b></p> <p><b>Add indicator:</b>  <b>Creating a settled, non-violent, positive atmosphere is accepted by all as an important aim.</b></p> <p><b>Add indicator:</b></p>	

	<b>Positive recognition is consistently given to prisoners and staff who engage in conflict resolution.</b>
11	<p>Women at risk or who have been subject to victimisation or violence are <b>protected</b>.</p> <p><b><u>PRT Comments:</u></b></p> <p>Change Expectation 11 to read:  <b>Staff confront anti-social behaviour, protecting all women from victimisation and violence. (RTWP Preliminary Observations, 9).</b></p> <p><b>Comment:</b>  There is an implication that only women who have been subject to victimisation need protection, which conflicts with the Safety Expectation, according to which all women should be protected from victimisation. Consistent action by officers in confronting victimisation makes an important contribution to violence reduction but staff should not be encouraged to condone victimisation when they believe a recipient is not a vulnerable person. As written, the indicator also creates a dilemma for staff responding to mutual victimisation, which is common in prison settings. However, it is right that women who may be vulnerable, due to the nature of their offence or personal circumstances such as human trafficking, should be listed explicitly as requiring protection.</p> <p>In PRT's Counted Out report on Black, Asian and Minority Ethnic Minority women we noted that BAME women report high levels of racism and victimisation by other prisoners and staff – see pp 27 – 31. Suggest rewording the 5<sup>th</sup> listed indicator or adding a further indicator focussed on the need to check BAME and Foreign national women are properly protected.</p> <p><b>Note that use of the term 'vulnerable' is open to interpretation – and may be influenced by unconscious bias – see Lammy review.</b> Vulnerability is frequently context specific. Labelling one woman or group as 'vulnerable' may mean that vulnerability experienced by women not labelled as such go unrecognised.</p>
12	<p>Women and staff are involved in determining how they can live together cooperatively and safely, by respecting each other for the mutual benefit of all.</p> <p><b><u>PRT Comments:</u></b></p> <p><b>Comment: Safety surveys should be annual, available in accessible formats, and include questions about the prevalence and nature of victimisation. Surveys should also elicit women's views on how to prevent violence.</b></p> <p><b>Add indicator:</b>  <b>Where safer custody representatives are used, their roles are clearly defined and they receive adequate training and support.</b></p> <p><b>Comment: Safer custody reps – or 'violence reduction' reps, 'anti-bullying' reps – can make a significant contribution to giving women a say in how they can live together cooperatively and safely. Their presence demonstrates to women that prison managers are willing to work closely with women to prevent violence.</b></p> <p><b>Added indicator:</b>  <b>The regime timetable and daily routines are scrutinised to ensure they do not contribute to aggressive or violent behaviour.</b></p>

13	<p>Women <b>understand the purpose of the IEP system</b> and how they can progress within it. Prisoners and staff are <b>clear about the criteria</b> for promotion and demotion.</p> <p>Note it should be possible for all women to progress within the IEP system regardless of ability and needs.</p>
14	<p>The IEP scheme is <b>proportionate and applied fairly, transparently and consistently</b>.</p> <p><b>Add indicator that ‘family visits and contact are/should not be affected by IEP status’ – this is a point made by PRT in previous consultations about the IEP scheme and is particularly important for women in prison.</b></p> <p><b>The new IEP scheme gives governors a lot of discretion, so need for fairness and procedural justice (voice, transparency, respect and trustworthy motives). The IEP scheme should reflect the commitments in the Female Offender Strategy, the Farmer Review for Women, the Lammy Review and be bound by international standards.</b></p>
<p><b><u>Self-harm and suicide prevention</u></b></p> <p>The prison provides a safe and secure environment which reduces the risk of self-harm and suicide. Vulnerable women are identified at an early stage and given the necessary support. All staff are aware of and alert to vulnerability issues, are appropriately trained and have access to proper equipment and support.</p> <p><b>PRT Comment:</b>  <b>This Expectation should be re-worded to reflect RTWP 16:</b></p> <p>The prison provides a safe and secure environment which <b>promotes mental and physical wellbeing and</b> reduces the risk of self-harm and suicide. <b>Prison managers and staff take a proactive and positive approach to improve prison morale.</b> The specific needs of different groups are recognised and acted on. Vulnerable women are identified at an early stage and given the necessary support. All staff are aware of and alert to vulnerability issues, are appropriately trained and have access to proper equipment and support. <b>(see also NMR, 105)</b></p>	
<p><b><u>PRT Comment:</u></b></p> <p><b>Prisons must have effective systems for family members and external agencies such as our advice line to communicate urgent concerns about someone’s wellbeing (e.g. an immediate intention to harm themselves or others). Our advice service regularly experiences difficulty in reporting urgent safeguarding concerns to safer custody or duty managers in prisons, leaving the individual at risk. Many prisons have begun implementing the ‘communication gateway’ recommended by Lord Farmer but in many places, this amounts to voicemail or email inboxes which are checked infrequently – as found by HMIP recently at HMP Bristol. We recommend that this system is a regularly inspected to ensure people are being safeguarded appropriately, and that the expectations reflect this. (This ties into the wider point above about identifying needs effectively, both on reception/early days and when they develop later in sentence.)</b></p>	
15	<p>The prison provides a <b>safe and secure environment</b> which reduces the risk of self-harm and suicide. The <b>specific needs of different groups are recognised</b> and acted on.</p>

	<p><b><u>PRT Comment:</u></b></p> <p><b>Could there be more specific advice on early days in custody? (RTWP 2(1))</b></p> <ul style="list-style-type: none"> <li>- ‘Facilities where new prisoners can spend their first 48 hours to help with transition to prison life, which have been introduced in a number of prisons in the UK, for example, should be provided to all prisoners, but are particularly important in the case of women prisoners, who are especially vulnerable to mental distress, and particularly during their first days of imprisonment’.</li> </ul>
16	<p>Women at risk of self-harm or suicide receive <b>personal and consistent care</b> and support to address their individual needs and have <b>unhindered access to help</b>.</p>
	<p><b><u>PRT Comments:</u></b></p> <p>Our advice service heard from transgender women being held in the specialist unit within the women’s estate - they reported they did not have access to Listeners despite needing and requesting them. We recognise that this is included in the indicators, but in practice we are aware there are issues, so more attention should be given.</p> <p>Note the Farmer review recommendations for taking into account family ties and implement in number 15/16.</p> <p><b>Could there be more emphasis on the need to proactively support prisoners to tackle the causes of their distress, and recognition of the potential harm caused by some precautions to prevent self-harm and suicide? See RTWP 16:</b></p> <ul style="list-style-type: none"> <li>- ‘All too often initiatives to prevent suicide consist only of technical solutions, such as the removal of items that may be used for suicide, the introduction of additional restrictions to reduce possibilities of suicide, which do not address the cause of mental distress, which lead to acts of suicide or self-harm. Such precautions may in many cases exacerbate the situation’.</li> </ul>
<p><b><u>Safeguarding (protection of adults at risk) and women with complex needs</u></b></p>	
<p>The prison promotes the welfare of all prisoners, particularly adults at risk, and protects them from all kinds of harm and neglect.</p>	
<p><b><u>PRT Comments:</u></b></p> <p><b>Added indicator:</b></p> <p><b>There is routine and meaningful contact with Adult Social Care and robust arrangements for timely referrals and assessments as set out by the Care Act, and action following assessment whether eligible needs have been identified or not.</b></p> <p><b>Point 18 – what does ‘appropriately located’ mean? Women should be supported to live on the wing with everyone else (included) and not detained elsewhere (excluded). If ‘appropriately located’ means transfer to hospital care then this should be examined, especially why this is necessary and time elapsed. NMR 5.2</b></p>	
17	<p>Women, particularly adults at risk, are provided with a safe and secure environment which <b>protects them from harm and neglect</b>. They receive safe and <b>effective care and support</b>.</p>
	<p><b><u>PRT Comments:</u></b></p> <p><b>Awareness of NMR 39.3 needed:</b></p>

	<ul style="list-style-type: none"> <li>- Before imposing disciplinary sanctions, prison administrations shall consider whether and how a prisoner’s mental illness or developmental disability may have contributed to his or her conduct and the commission of the offence or act underlying the disciplinary charge. Prison administrations shall not sanction any conduct of a prisoner that is considered to be the direct result of his or her mental illness or intellectual disability.</li> </ul>
18	<p>Women with complex needs are <b>appropriately located</b> and <b>supported by trained</b> staff who are <b>resourced to meet their needs</b>.</p> <p><b><u>PRT comments:</u></b></p> <p><b>It should be made more explicit that necessary adjustments should be made for women with disabilities or complex needs, to ensure they receive an equal standard of care and support.</b></p> <ul style="list-style-type: none"> <li>- ‘Prison administrations shall make all reasonable accommodation and adjustments to ensure that prisoners with physical, mental or other disabilities have full and effective access to prison life on an equitable basis.’ NMR 5.2</li> </ul> <p><b>There should be a presumption that women with complex needs are cared for on normal location. See European Prison Rules</b></p> <ul style="list-style-type: none"> <li>- ‘Prisons can be intimidating places, especially for those who are different from the majority, for example, because of their personality, their sexual orientation or their offence. There can sometimes be a tendency on the part of prison authorities to respond to these issues in a negative manner by restricting the activities of the vulnerable groups, keeping them locked in units on their own, away from the rest of the prisoners. A likely consequence of this reaction is that, through no fault of their own, these prisoners will have a very impoverished regime, without access to many of the activities available to other prisoners. Unlike the groups previously mentioned, such as women, juveniles and those in pre-trial detention, there is no reason in principle why these other vulnerable groups should not be able to take a full part in prison activities. Locking them up separately “for their own safety” should be a matter of last resort, to be done only when absolutely necessary’</li> </ul> <p><b>Should there be a stronger expectation regarding segregation of women with complex needs, in view of NMR 45?</b></p> <ul style="list-style-type: none"> <li>- ‘The imposition of solitary confinement should be prohibited in the case of prisoners with mental or physical disabilities when their conditions would be exacerbated by such measures’</li> </ul>
<p><b><u>Security</u></b> Physical and procedural security measures are specific to the risks in a women’s prison. Security and good order are underpinned by effective security intelligence and positive staff-prisoner relationships. Women are safe from exposure to substance misuse while in prison.</p> <p><b><u>No Comment</u></b></p>	
19	<p>Women are able to reside in a safe environment where <b>security is proportionate</b> to the risks of the women held.</p> <p><b><u>PRT Comment:</u></b> We recommend that this be more robustly phrased, and that the nature of the risk factors in question be clear? <b>See EPR 51.1:</b></p> <ul style="list-style-type: none"> <li>- ‘<b>The security measures applied to individual prisoners shall be the minimum necessary to achieve their secure custody.</b>’</li> </ul>



20	<b>Restricted status is only applied when justified</b> by the security risks presented by individual women.
	<b>No Comment</b>
21	Women assessed as ‘ <b>restricted status</b> ’ have access to a full regime which meets their sentence plan.
	<b>No Comment</b>
22	Women’s wellbeing is safeguarded by effective security intelligence. Women are subject to <b>searching measures which are appropriately assessed and proportionate.</b>
	<p><b><u>PRT Comments:</u></b></p> <p><b>See also comment at 5 above.</b></p> <p><b>There may be a need for more restrictive language about strip searches (see relevant standards in NMR and RTWP):</b></p> <ul style="list-style-type: none"> <li>- NMR 50: ‘Searches shall be conducted in a manner that is respectful of the inherent human dignity and privacy of the individual being searched’</li> <li>- NMR 51: ‘Searches shall not be used to harass, intimidate or unnecessarily intrude upon a prisoner’s privacy. For the purpose of accountability, the prison administration shall keep appropriate records of searches, in particular strip and body cavity searches and searches of cells, as well as the reasons for the searches, the identities of those who conducted them and any results of the searches.’</li> <li>- NMR 52: ‘Prison administrations shall be encouraged to develop and use appropriate alternatives to intrusive searches’.</li> <li>- RTWP 19: ‘Effective measures shall be taken to ensure that women prisoners’ dignity and respect are protected during personal searches’</li> <li>- RTWP 19: ‘No prisoner – regardless of gender – should be humiliated or be required to strip completely during a search. Such searches can be carried out by exposing parts of the body only in turn to protect, to the extent possible, the dignity of the individual being searched. Special sensitivity should be demonstrated in the case of women, however, because they are likely to feel the humiliation of undergoing intimate searches particularly.<sup>54</sup> The experience may be extremely distressing and traumatising if they have been victims of sexual abuse in the past.’</li> </ul> <p>Staff should be aware that prisoners with certain disabilities, such as autism, may experience sensory difficulties that make physical contact hard to bear and distressing.</p> <p><b>There should be an explicit reference to the need for training on dynamic security. See NMR 76:</b></p> <ul style="list-style-type: none"> <li>- ‘Training referred to in paragraph 2 of rule 75 shall include, at a minimum, training on...Security and safety, including the concept of dynamic security.’</li> </ul> <p><b>Add indicator:</b></p> <p><b>Staff know the prisoners who are in their care. (EPR 51.2)</b></p> <p><b>Staff have completed training in trauma-informed practice, and understand the histories of abuse and trauma that affect a significant proportion of women under their care and supervision.</b></p>
23	Effective processes are in place to <b>protect women from misconduct or illegal conduct by staff.</b>

	<p><b><u>PRT Comment:</u></b></p> <p>PRT’s advice and information helpline often hears from people who have limited faith in the fairness and confidentiality of processes to challenge even serious misconduct and are often fearful of repercussions as a result. Indicators under this expectation acknowledge this, but we encourage inspectors to seek views of those who have not complained as well as look at the results of those who have.</p> <p><b>PRT propose an added indicator:</b>  <b>Women who report abuse are provided with immediate protection, support and counselling. RTWP 25</b></p>
<p><b><u>Disciplinary procedures</u></b>  Disciplinary procedures are applied fairly and for good reason. Women understand why they are being disciplined and can appeal against any sanctions imposed on them.</p> <p>It is important that prison rules are accessible to all the women in the prison.</p>	
24	<p>Women are subject to <b>reasonable disciplinary procedures</b>, which are applied fairly and for good reason.</p>
	<p><b><u>PRT Comments:</u></b></p> <p><b>What efforts are made to understand what lies behind the behaviour that led to disciplinary procedure?</b> For example, a SEN teacher in a STC reviewed which boys were routinely ‘in bother’ and found that a high proportion had communication difficulties and other needs. NMR 39.3 The recent Disabilities Trust report ‘Making the Link’ highlights the extent of previously unidentified brain injury amongst the women in one prison, and domestic abuse as a major cause. PRT’s recent report <i>Out of the Shadows – women with learning disabilities in contact with the criminal justice system</i> highlights the over-representation of women with learning disabilities in prison. An understanding of this should underpin disciplinary procedures for them to be fairly applied and well-understood.</p> <p><b>Add indicators:</b>  <b>Staff adopt a trauma-informed approach to understanding the behaviour</b></p> <p><b>Prior to an adjudication, the prison assesses whether a woman’s mental health condition or learning disability, or previous experience of trauma may have contributed to her conduct. (NMR 39.3)</b></p> <p><b>Women whose behaviour is judged to have resulted directly from a mental health condition or learning disability are managed apart from disciplinary awards. (NMR 39.3)</b></p> <p><b>Suggested additional indicator:</b>  <b>Restorative practices, delivered by properly trained individuals, are used to complement the prison’s formal disciplinary process.</b></p> <p><b>Added indicator:</b>  <b>Governors monitor adjudications for disproportionate use on groups with protected characteristics and apply ‘explain or reform’ when disparities are persistent.</b></p>

	<p><b>Added indicator:</b> Responses to disciplinary infractions reject the harmful behaviour and seek to re-integrate the person who caused the harm.</p> <p><b>Added indicator:</b> The prison has considered any unmet needs that could be addressed to help the woman avoid similar behaviour in future.</p>
25	<p>Women subject to disciplinary procedures <b>understand the charges and procedures</b> they face.</p> <p><b>PRT Comments:</b></p> <p>Especially important are arrangements to ensure women understand the case against them and can participate effectively in proceedings.</p> <ul style="list-style-type: none"> <li>• How Is information made accessible? For example, Easy Read and audio/video formats? (NMR, 5.2)</li> <li>• What arrangements are in place should a woman need communication support, for example, a learning disability nurse, communication/speech and language specialist?</li> <li>• Similarly, they would need to know/understand how to avoid future breaches of discipline.</li> </ul>
<p><b>Use of force</b></p> <p><b>No Comment</b></p>	
26	<p>Women are only subject to force which is <b>legitimate</b>, used as a <b>last resort</b> and subject to <b>rigorous governance</b>.</p> <p><b>PRT Comments:</b></p> <p><b>Change indicator:</b> Governors monitor use of force for disproportionate use on individuals with protected characteristics and apply 'explain or reform' when disparities are persistent.</p> <p><b>Add indicator:</b> Women equality/diversity representatives attend all or part of use of force committee meetings and are encouraged to comment on factors that might cause disproportionate application of use of force. (See Lammy Review, recommendation 25)</p>
27	<p>When women are <b>physically restrained</b>, it is for the <b>minimum amount of time</b> necessary, by trained staff using <b>approved techniques</b>. Following restraint, prisoners are <b>appropriately monitored and supported</b>.</p> <p><b>PRT Comments:</b></p>

	<p><b>Add indicator:</b>  <b>Guidelines and training on the use of force protects women from gender-based violence, abuse and/or sexual harassment. RTWP, 31.</b></p>
28	<p>Women are located in special or unfurnished accommodation, or placed in mechanical restraints or strip clothing, only as a <b>last resort</b> and are subject to measures which <b>protect their human dignity.</b></p>
	<p><b>No Comment</b></p>
<p><b>Segregation</b></p>	
<p><b>Comments:</b></p>	
29	<p>Women are <b>kept safe at all times while segregated</b> and individual needs are recognised and given proper attention.</p>
	<p><b>PRT Comments:</b></p> <p><b>Add indicator:</b>  Segregation is not applied to pregnant women, women with infants, or breastfeeding mothers. (RTWP, 22)</p> <p><b>Add indicator:</b>  Segregation is not used on women whose mental or physical disabilities would be exacerbated by segregation. (NMR, 45.2)</p> <p><b>Note – the prevention of the segregation of women on an ACCT and searching on arrival are two separate indicators.</b></p>
30	<p>Women are segregated <b>safely and decently</b> for the <b>shortest possible period</b> and are <b>supported to reintegrate</b> into the normal regime at the <b>earliest opportunity.</b></p>
	<p><b>PRT Comments:</b></p> <p><b>Change indicator:</b>  <b>Women who are awaiting assessment for transfer to a secure mental health facility are not held in the segregation unit.</b></p> <p><b>Comments – Women who have been assessed as requiring a transfer, or awaiting an assessment, cannot be held safely as segregation causes mental distress; neither can they be ‘supported to reintegrate’ when the purpose is to transfer them to a mental health facility.</b></p> <p><b>Add indicator:</b>  <b>Medical staff report to the governor/director at any time when the effect of segregation on a person’s mental health becomes a concern. (NMR 33)</b></p>
31	<p>Segregated women <b>understand the reasons for their segregation, the rules and regime</b> available to them and <b>how to access activities.</b></p>

	<p><b><u>PRT Comments:</u></b></p> <p><b>Added indicator:</b>  <b>Women segregated have opportunities to challenge the reasons for their segregation.</b></p> <p><b>Comment: Procedural justice requires ‘voice’ – the woman having a say in her treatment. This opportunity should normally be provided in segregation reviews.</b></p>
32	<p>Women are encouraged and <b>enabled to access a range of purposeful activities</b> during their time in the segregation unit. They have access to the same range of activities, facilities and services as women on normal location.</p>
	<p><b><u>PRT Comments:</u></b></p> <p><b>Comment:</b>  <b>Purposeful activities (point 32) need to be accessible for women with a range of needs/abilities/interests: What counts as ‘purposeful’ and purposeful for whom?</b></p> <p><b>Added indicator:</b>  <b>Yards are provided with exercise equipment.</b></p>
<p><b><u>Substance misuse</u></b>  Women with drug and/or alcohol problems are identified at reception and receive effective treatment and support throughout their stay in custody.</p> <p><b><u>Comments:</u></b>  Treatment and psychosocial interventions and services should be accessible for all women, including those with mental health conditions and learning disabilities.</p>	
33	<p>Women dependent on drugs and/or alcohol receive <b>clinical treatment which is safe, effective</b> and meets individual needs.</p>
	<p><b>Add indicator</b>  <b>Arrangements are in place to ensure continuity of medication unless contra-indicated.</b></p>
34	<p>Women have <b>prompt access</b> to a range of psychosocial interventions and services, which are <b>consistent with the assessed needs of the population.</b></p>