

## Consultation on Expectations: Criteria for assessing the treatment of and conditions for women in prison

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### Part 3: Specific areas of Expectations

If you have comments about specific areas of the revised *Expectations*, please add them to the table below, using the paragraph numbers from the consultation document as references.

Paragraph number	Comments
<b>Safety</b>	
1. Women are transferred safely and in accordance with their individual needs.	<p>We recommend the penultimate bullet point in this section be reworded to read:</p> <ul style="list-style-type: none"> <li>• Women are offered comfort breaks. The frequency of stops considers individual circumstances and needs, for example health, disabilities, <i>menstruation</i> and breastfeeding.</li> </ul>
2. Women feel and are safe on their arrival at the prison and throughout their early days.	<p>We recommend the addition of a further bullet point before the final bullet point, to read:</p> <ul style="list-style-type: none"> <li>• <i>Traditionally 'masculine' equipment and supplies are readily available</i></li> </ul>
3. Women are helped and supported to address their individual concerns, needs and risks in reception and during their early days in the prison.	<p>We would highlight a comment from our previous submission to be considered further:</p> <ul style="list-style-type: none"> <li>• 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 had not been able to phone home because she didn't understand the PIN system and didn't like to ask for help. (NMR 5.2)</li> </ul>
5. All staff actively engage with women, know them as individuals and develop positive working relationships with them.	<p>We suggest the following addition to the second bullet point:</p> <ul style="list-style-type: none"> <li>• Staff know the women in their care well, understand how to promote their individual well-being and are alert to triggers for person crisis. <i>Women also know staff well.</i></li> </ul>
7. Women are supported to develop positive relationships with one another.	<p>We recommend editing the fourth bullet point in this section to read:</p> <ul style="list-style-type: none"> <li>• When relationships (<i>including intimate</i>) break down care is provided to make sure both parties are safe and supported.</li> </ul> <p>There are no clear rules governing intimate relationships and there is a risk that officers may use their discretion which might be based in prejudice. It is not the duty of the inspectorate to set those rules but in the absence of those rules, the inspectorate cannot legislate in place of that. Therefore, we recommend removing the final bullet point in this section which reads:</p> <ul style="list-style-type: none"> <li>• Staff respond to intimate relationships between women constructively, setting out clear rules and boundaries.</li> </ul> <p>We recommend that it be replaced as follows:</p> <ul style="list-style-type: none"> <li>• <i>Staff should respond to intimate relationships constructively, with an awareness that they will happen, but should be alert to any boundaries being crossed which may compromise an individual's</i></li> </ul>

	<p><i>safety. Support should be readily available when partners move prisons or are released, and women should be able to access domestic abuse support.</i></p>
<p>8. The prison has an effective strategy to reduce self-harm, prevent suicide and promote the well-being of women.</p>	<p>We think it is important to draw more attention to the social environment as opposed to the individual, so draw your attention to PRT's previous recommendation, which reads:</p> <ul style="list-style-type: none"> <li>• <i>The prison provides a safe and secure environment which promotes mental and physical wellbeing and reduces the risk of self-harm and suicide. Prison managers and staff take a proactive and positive approach to improve prison morale. 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. (see also NMR, 105)</i></li> </ul> <p>We recommend an addition to the second bullet point in this section, so it reads:</p> <ul style="list-style-type: none"> <li>• The analysis underpins a clear self-harm reduction and suicide prevention strategy and robust action plan. This requires action from the whole prison, <i>so that whole environment promotes mental and physical wellbeing.</i></li> </ul>
<p>9. Women receive individualised care from a multidisciplinary team to reduce their likelihood of self-harm and suicide and improve their well-being.</p>	<p>We recommend an addition to the second bullet point in this section, so it reads:</p> <ul style="list-style-type: none"> <li>• Friends, family and others involved in supporting women know how to raise concerns about their risk of self-harm or suicide and women can access these sources of support to assist their recovery. <i>The prisons are responsive to this and keep those involved updated.</i></li> </ul>
<p>11. Women at risk of harm, abuse or neglect are identified and protected.</p>	<p>We recommend an additional bullet point in this section to read:</p> <ul style="list-style-type: none"> <li>• <i>A safer custody hotline is in place and clearly promoted to families and friends. There is a process to regularly check, record and respond to any concerns raised through this line.</i></li> </ul>
<p>Behaviour management</p> <p>HMPPS and MoJ have put a great deal of effort into the Incentives and Earned Privileges (IEP) scheme in relation to incentives, but this expectation seems to refer back to an older discredited model. We would strongly recommend the language is looked at to reflect this, including not using 'behaviour management'.</p>	
<p>12. Women are encouraged to behave positively and are involved in promoting a</p>	<p>We recommend an addition to the fifth from last bullet point, so it reads:</p> <ul style="list-style-type: none"> <li>• Conflict between women is managed well. <i>Staff are alert to conflict and know when to intervene to prevent it escalating. Staff will investigate incidents of conflict thoroughly and speak</i></li> </ul>

<p>healthy and safe prison community.</p>	<p>sensitively to the women involved. Mediation is used appropriately.</p>
<p>13. Women who need additional support to manage harmful behaviours have a detailed care plan that includes consideration about their location within the prison and the support they need.</p>	<p>We recommend an addition to the first bullet point, so it reads:</p> <ul style="list-style-type: none"> <li>• Staff <i>have a trauma informed approach</i> to understand the underlying reasons for harmful behaviours.</li> </ul> <p>We have recommended this change because it should be rooted in common understanding, which reduces the need for staff discretion.</p>
<p>14. Women feel and are safe from bullying, violence and other antisocial behaviours by others.</p>	<p>We recommend rewording the third bullet point to read:</p> <ul style="list-style-type: none"> <li>• All incidents of violence and <i>other serious victimisation</i> are reported and investigated thoroughly.</li> </ul>
<p>16. Women are only separated as a last resort with the proper authorisation. Separation is carried out safely, in line with women's individual needs and never as a punishment.</p>	<p>We recommend an addition to the sixth bullet point, to read:</p> <ul style="list-style-type: none"> <li>• A multidisciplinary staff group monitors women in segregation units, those who are separated on normal location and those in specialist units to ensure they are held there as a last resort and that it has been appropriately authorised. There is analysis of patterns and trends about who is being separated (<i>including protected characteristics</i>) and the reasons for it.</li> </ul> <p>We recommend an addition to the final bullet point, to read:</p> <ul style="list-style-type: none"> <li>• Separated women have daily access to a senior manager, chaplain, and a health services professional, in private if requested, and a record of these visits is maintained. A member of the Independent Monitoring Board (IMB) team visits them at least once a week. <i>Medical staff report to the governor/director at any time when the effect of segregation on a person's mental health becomes a concern.</i></li> </ul> <p>This addition is taken from the Nelson Mandela rules, number 33.</p>
<p>17. Women are kept safe at all times while separated an individual well-being is fully recognised and promoted.</p>	<p>We recommend an additional to the final bullet point, to read:</p> <ul style="list-style-type: none"> <li>• Women who are separated retain their personal possessions unless there are documented exceptional circumstances evidenced by a multidisciplinary review. <i>There must be opportunity for regular review of any decision.</i></li> </ul> <p>We note that the smallest number of personal possessions possible should be removed, whilst recognising the emotional consequences of removing possessions.</p>
<p>18. Women in the segregation unit or who are separated live in decent conditions and</p>	<p>We recommend rewording the first bullet point to read:</p> <ul style="list-style-type: none"> <li>• Segregation units are decent, clean and <i>conducive to the wellbeing of women.</i></li> </ul>

<p>have a regime that is equivalent to the rest of the prison.</p>	<p>We note the ‘segregation unit’ here includes exercise yards, which should not be austere, but should allow for activities which are conducive to the wellbeing of women.</p>
<p>19. Force is only used as a last resort and never as a punishment. If force is used on women it is justified, necessary, proportionate and subject to rigorous governance.</p>	<p>We recommend amending the third bullet point, to read:</p> <ul style="list-style-type: none"> <li>• <i>Where spontaneous use of force has occurred, a body worn video camera has been activated at the first possible moment and the evidence is available to view subsequently.</i></li> </ul> <p>We recommend an addition to bullet point five, to read:</p> <ul style="list-style-type: none"> <li>• <i>Planned use of force is properly authorised and force is only ever used once all other avenues of persuasion have been exhausted. Body worn video cameras are always used in these circumstances.</i></li> </ul> <p>Bullet point seven:</p> <ul style="list-style-type: none"> <li>• <i>Women with challenging behaviours, including as a result of past abuse, trauma, physical disability, learning disability or personality disorder, have care plans which highlight risk factors and set out alternative management protocols which reduce the likelihood of restraint techniques becoming necessary.</i></li> </ul> <p>Women should be able and are encouraged to contribute to local policy on use of force, including but not limited to advising what is helpful when they are in distress. This will better inform decision making around local policies.</p> <p>We recommend the inclusion of ‘carried’ to bullet point ten, so it reads:</p> <ul style="list-style-type: none"> <li>• <i>Batons and PAVA spray are never used nor carried.</i></li> </ul> <p>We recommend an addition to bullet point eleven, to read:</p> <ul style="list-style-type: none"> <li>• <i>Use of force data is monitored (including data on protected characteristics) and emerging patterns are identified and acted on.</i></li> </ul> <p>We recommend an additional sentence to the second last bullet point, to read:</p> <ul style="list-style-type: none"> <li>• <i>Use of force documentation and associated CCTV or video footage is retained appropriately and is scrutinised by senior managers to identify good practice, disproportionate behaviour, opportunities for improvement and possible ill-treatment. Requests from women on whom force has been used to look at CCTV are processed appropriately and efficiently in line with data protection legislation.</i></li> </ul>
<p>20. Women are only ever located in special or unfurnished accommodation, or placed in mechanical restraints or strip clothing, as a last resort</p>	<p>We recommend an additional bullet point which reads:</p> <ul style="list-style-type: none"> <li>• <i>These decisions are subject to regular and frequent process of review, so as soon as measures are no longer required, they are removed.</i></li> </ul>

and when measures are put in place to protect their dignity.	
<b>Security</b>	
21. Women live in a safe prison community where the security measures applied are the minimum necessary to achieve their secure custody.	<p>We recommend additional wording in bullet point four, to read:</p> <ul style="list-style-type: none"> <li>• Security restrictions for individual women are only applied when necessary, <i>are regularly reviewed</i> and are based on a clear justification of the risks they present.</li> </ul>
23. Effective processes are in place to protect women from misconduct or illegal conduct or illegal conduct by staff.	<p>We recommend the additional wording in the first bullet point, to read:</p> <ul style="list-style-type: none"> <li>• Women know how to <i>and are able to</i> make confidential complaints about staff. <i>Women are confident that the complaints system works effectively and understand the limits of confidentiality.</i></li> </ul>
<b>Respect</b>	
31. Women have frequent and easy access to all forms of communication, subject to a risk assessment for public protection concerns.	<p>We recommend the addition of the following wording to bullet point two:</p> <ul style="list-style-type: none"> <li>• Women have easy and regular access to video calling systems free of charge, which are used in addition to <i>and never as a substitute for</i> actual visits and phone calls.</li> </ul> <p>We would highlight our <a href="#">letter to the Secretary of State for Justice</a>, along with <a href="#">his response confirming</a> that it is not the intention to substitute face-to-face visits with video calls.</p> <p>We also recommend the addition of the following bullet point:</p> <ul style="list-style-type: none"> <li>• <i>Easy access to video and phone calls is not limited by prohibitive costs.</i></li> </ul>
35. Women have confidence in the complaints process, which is effective, timely and well understood.	<p>We recommend additional wording to bullet point two, to read:</p> <ul style="list-style-type: none"> <li>• Women have easy access to complaint forms and can submit them confidentially. <i>Women receive confirmation that their complaint has been received.</i></li> </ul> <p>This addition is in line with the complaints policy framework which introduced detachable slips on COMP1 and COMP1A forms for this purpose.</p> <p>We recommend the addition of two further bullet points, outlined below:</p> <ul style="list-style-type: none"> <li>• <i>Complaint responses take a problem-solving approach.</i></li> <li>• <i>The standard of proof for assessing complaints is 'the balance of probabilities'.</i></li> </ul> <p>This recommendation is in line with the <a href="#">Lammy Review</a> recommendation 26, which has been accepted by the government. This is also in line with the Prisoner Complaints Policy Framework, implemented on 1 August 2019.</p>
38. Women live in a clean, decent and	<p>We recommend bullet point number four is reworded to read as follows:</p> <ul style="list-style-type: none"> <li>• Outside areas are well maintained, clean <i>and promote wellbeing.</i></li> </ul>

comfortable environment.	
40. Women have enough clean clothing of the right kind, size, quality and design to meet individual needs.	We recommend the addition of the following bullet point: <ul style="list-style-type: none"> <li>• <i>'Masculine' clothing options (including footwear and underwear) in a full range of sizes will be advertised and available on request.</i></li> </ul>
42. Women's property held in storage is secure, and women can access it on request.	We recommend the additional bullet point below: <ul style="list-style-type: none"> <li>• <i>Concerns about missing property are investigated and responded to efficiently and sensitively.</i></li> </ul>
45. Women have a weekly opportunity to purchase a suitable range of goods at reasonable prices.	We recommend an addition to bullet point four, to read as: <ul style="list-style-type: none"> <li>• <i>Women do not have to buy sanitary items because they are freely and readily available.</i></li> </ul>
46. Women are cared for by services that accurately assess and meet their health, social care and substance misuse needs while in detention and prior to release.	We want to highlight that prisoners should also be provided with information on how to self-refer. The relevant <a href="#">PSI</a> states: <ul style="list-style-type: none"> <li>• Prisons must ensure that information provided by the relevant local authority about needs assessments, care and support to meet eligible needs, and how to access needs assessments and care and support is made available to prisoners.</li> </ul>
48. Women are supported and encouraged to improve their health and well-being	We recommend the addition of the following wording to bullet point seven: <ul style="list-style-type: none"> <li>• <i>Women can confidentially access contraception and sexual health services. Barrier protection, lubricants and related health advice is freely and readily available on an anonymous basis, without fear of repercussions from staff, including on release.</i></li> </ul>
49. Women's sexual health and reproductive needs are assessed and met during detention and on release.	We recommend rewording the first bullet point to read: <ul style="list-style-type: none"> <li>• <i>Women are offered screening for sexual health and reproductive needs on arrival and referred for follow-up advice and appointments as appropriate.</i></li> </ul> <p>We note the importance of this screening being fully inclusive and LGBT-friendly.</p> <p>We recommend the addition of the following bullet point:</p> <ul style="list-style-type: none"> <li>• <i>Screening is carried out sensitively and takes account of protected characteristics.</i></li> </ul>
56. An effective whole-prison strategic approach reduces the demand for drugs and alcohol.	We would highlight the need for a whole prison approach to include measures to reduce demand as well as supply. These measures may include promoting wellbeing, time out of cell, purposeful activity, etc.



<p>61. The prison employs fair processes to ensure no individual or group is disadvantaged.</p>	<p>We recommend using ‘protected characteristics’ in place of ‘diverse needs’ so it reads as follows:</p> <ul style="list-style-type: none"> <li>• Effective and regular local and national monitoring is in place, covering all <i>protected characteristics</i>. This ensures equality of treatment and access to services, for example, allocation to activities.</li> </ul>
<p>61. Discriminatory behaviour is challenged robustly and consistently.</p>	<p>We recommend rewording the second bullet point to read:</p> <ul style="list-style-type: none"> <li>• <i>Prison management will ensure women and staff are actively supported to understand what behaviours and language are unacceptable through appropriate training and support.</i></li> </ul> <p>We recommend adding the following sentence to bullet point six:</p> <ul style="list-style-type: none"> <li>• Responses to discrimination complaints are timely and are based on a thorough investigation. <i>The standard of proof applied is the balance of probabilities and the response takes a problem-solving approach.</i></li> </ul>
<p>64. Women with protected characteristics and any other minority characteristics are treated equitably and according to individual needs.</p>	<p>We recommend a whole prison approach to promoting equality and fostering good relationships among groups with protected characteristics (public sector equality duty number three).</p>
<p>67. The specific needs of women with disabilities are met.</p>	<p>We recommend the additional wording to the first bullet point:</p> <ul style="list-style-type: none"> <li>• The prison accurately identifies and assesses the needs of women with disabilities, including learning disabilities, <i>and other neurological impairments</i> and this information is kept up to date and shared appropriately with all relevant staff <i>respecting confidentiality</i>.</li> </ul> <p>How is disability being established? Are assessments being made?</p> <p>We also recommend the addition of the following bullet point:</p> <ul style="list-style-type: none"> <li>• <i>Staff should be educated to understand the way in which neurological impairment such as brain injury may present in behaviour.</i></li> </ul>
<p>68. The specific needs of trans, gender non-conforming (including non-binary and gender fluid) and intersex prisoners are met.</p>	<p>We are concerned that expectation 68 groups non-binary and gender fluid people as being gender-nonconforming, and as not being trans. Some non-binary and gender-fluid people will identify as transgender, and not as gender-nonconforming, especially because ‘gender non-conforming’ is often seen as referring to (often cisgender) people who appear/behave in non-stereotypical ways. We would suggest consulting with <a href="#">Stonewall</a> or Gendered Intelligence to finalise wording in this section.</p> <p>Prisons should actively foster good relationships between transgender and cisgender prisoners, this could include celebrating calendar events and stocking relevant library materials.</p>

	<p>Bullet point five:</p> <ul style="list-style-type: none"> <li>• All prisoners have access to the items they use to maintain their gender identity. Any restrictions are based on properly evidenced justifications.</li> </ul> <p>Prisoners in women’s prisons should have access to items on the canteen sheet available to those in men’s prisons and vice versa. Prisoners should also be able to buy gender-appropriate clothing in prison.</p> <p>Bullet point six:</p> <ul style="list-style-type: none"> <li>• Trans, gender non-conforming and intersex prisoners are routinely addressed as and referred to in the gender they identify with, using their preferred pronoun and by their chosen name.</li> </ul> <p>Gender neutral alternatives to catch-all terms like ‘ladies’ should be encouraged and explained.</p> <p>Bullet point seven:</p> <ul style="list-style-type: none"> <li>• Prisoners who wish to begin gender reassignment are permitted to live permanently in their chosen gender identity and can access appropriate medical and other specialist support.</li> </ul> <p>Prisoners should be able to easily and anonymously access information about transitioning, and the details of relevant support organisations. These should be freely available in the library.</p> <p>Bullet point nine:</p> <ul style="list-style-type: none"> <li>• Staff receive training and support which enables them to support prisoners in transition and prisoners who are trans, gender non-conforming or intersex.</li> </ul> <p>There should be a member of staff in each women’s prison who is responsible for supporting LGBT prisoners. Staff should have received appropriate training and have sufficient time to undertake the role. There should also be LGBT prisoner representatives and an LGBT <i>support</i> group in each prison (separate to LGBT forums which staff run to gather prisoners’ views).</p> <p>There needs to be recognition that not all trans prisoners will make their gender known to the prison. Staff should not make assumptions about prisoners’ genders, and should be up to date with appropriate terminology.</p>
69. The specific needs of prisoners of all sexual orientations are met	<p>Prison staff should not share confidential information about a person’s sexuality (or gender) without their consent.</p> <p>Prisons should actively foster good relationships between LGBT and straight, cisgender prisoners. This could include celebrating calendar events and stocking relevant library materials.</p> <p>Bullet point one:</p>

	<ul style="list-style-type: none"> <li>Lesbian and bisexual women are supported via specific networks and groups within the prison and through referral to external support networks.</li> </ul> <p>We refer back to our comment in Expectation 7 regarding intimate relationships.</p> <p>Bullet point two:</p> <ul style="list-style-type: none"> <li>Staff training and development promotes equal respect for women of all sexual orientations and raises awareness of the potential discrimination faced by lesbian and bisexual prisoners.</li> </ul> <p>We note that there should also be an understanding that sexuality is fluid and might change while in prison. This does not make a person's sexuality any less valid. Prisoners should have access to counsellors to discuss their sexuality, and for support with coming out, if required. Homophobia, and in particular biphobia, can be subtle, and less overt forms of discrimination should be recognised too.</p> <p>We recommend rewording the third bullet point to read:</p> <ul style="list-style-type: none"> <li>Action is taken to identify and prevent homophobic and <i>biphobic</i> language and behaviour and interventions for challenging discriminatory language are used.</li> </ul> <p>Prisoners should be confident in the DIRF process. They should know that they can report queerphobia from staff or other prisoners, and that complaints will be responded to appropriately.</p>
70. The specific needs of young women (aged 18-25) are met.	<p>We recommend removing the third from last bullet point, and instead including the following:</p> <ul style="list-style-type: none"> <li><i>Incentive schemes are adapted to meet the specific needs of young adult women.</i></li> </ul>
71. The specific needs of the older population are met.	<p>It is a woman's right to decide on how her age is taken into account. Assumptions should not be made, and the views of women should always be considered and acted upon. This expectation should reflect this fact.</p>
72. Women are able to practice their religion fully and in safety.	<p>We recommend an additional sentence to the second from last bullet point, so that it reads as follows:</p> <ul style="list-style-type: none"> <li>Women are able to obtain, keep and use objects and books that have religious significance. <i>These items are respected in incidents such as cell searches and decisions whether to confiscate items.</i></li> </ul>
<b>Purposeful activity</b>	
76. Women have regular and predictable time out of cell which is sufficient to promote their rehabilitation and overall well-being.	<p>We recommend the final bullet point should be reworded to read as follows:</p> <ul style="list-style-type: none"> <li>Women have the opportunity to telephone or video call their children, families and significant others <i>at times convenient to them and their family including but not limited to in the evening.</i></li> </ul>
79. Women can access a good range of creative	<p>We recommend rewording bullet point three to read as follows:</p>

<p>recreational and social activities which promote learning, well-being and rehabilitation.</p>	<ul style="list-style-type: none"> <li>• Women have access to a positive range of activities <i>including those</i> that are not gender stereotypical.</li> </ul> <p>We also recommend the addition of a further bullet point:</p> <ul style="list-style-type: none"> <li>• <i>Women are supported to engage in activities that will promote their successful resettlement including education, training and work.</i></li> </ul>
<p>80. Women benefit from regular access to a well-equipped library which has direct links to libraries in the community, library materials and additional learning resources that meet their needs. They are encouraged to use it frequently.</p>	<p>We recommend an addition to the second bullet point, so it reads:</p> <ul style="list-style-type: none"> <li>• The quantity and quality of library materials meets the needs of the prison population, <i>including those with protected characteristics.</i></li> </ul> <p>We also recommend an addition to bullet point four, to read:</p> <ul style="list-style-type: none"> <li>• <i>Women are made aware that</i> relevant, comprehensive and up-to-date legal textbooks, including prison legislation and polices are readily available.</li> </ul>
<p>Education, skills and work activities</p> <p>82.1</p> <p>82.2</p> <p>82.3</p>	<p>There should be a sufficiently diverse education curriculum available, recognising different protected characteristics, with enough capacity for all those to take part who want to.</p> <p>Staff should be aware that people may have undiagnosed disabilities and make referrals as necessary.</p> <p>Legitimate reasons for non-attendance should also be recognised e.g. chronic health problems.</p> <p>We would argue the first bullet point could be considered infantilising and may imply that women are not already responsible and respectful.</p>
<p>83. Purposeful activity outcomes for women are supported by effective leadership and management.</p>	<p>We suggest an addition to the sixth bullet point, to read:</p> <ul style="list-style-type: none"> <li>• The constructive use of free time is <i>facilitated</i> and encouraged.</li> </ul>
<p><b>Rehabilitation and release planning</b></p>	
<p>85. Women are actively engaged in identifying factors linked to their offending and developing or reviewing plans to address them</p>	<p>Bullet point four:</p> <ul style="list-style-type: none"> <li>• Families and other people significant to women are involved in the development and delivery of the plan.</li> </ul> <p>It is important that this is the case only with the person in prison's consent.</p> <p>The final bullet point in this section:</p> <ul style="list-style-type: none"> <li>• Women recalled to prison receive swift information about the reasons for their recall and are helped to access legal advice.</li> </ul> <p>We would recommend expanding this point to acknowledge the need for the prison not just to provide the information, but to explain it to the</p>

	person and ensure they understand why they were recalled, and the ramifications.
86. Women who have experienced abuse in the community or have particular vulnerabilities are supported appropriately	In all bullet points in this section, we recommend changing 'can access' to ' <i>can, and know how to</i> '.
88. Women are helped to maintain or find accommodation and have somewhere suitable and sustainable to live on release.	We recommend the addition of the following bullet point: <ul style="list-style-type: none"> <li>• <i>Referrals are made to local authorities in line with the Duty to Refer under the Homelessness Reduction Act 2017 and it is clear who holds the responsibility for this.</i></li> </ul>
90. Women on remand are supported to apply for bail. Women also benefit from early release or periods of temporary release to support their resettlement.	We recommend an addition to the first bullet point, to read: <ul style="list-style-type: none"> <li>• Women, including those detained for their own protection, are <i>given</i> bail information from a trained member of staff, <i>which they understand</i>, and are helped to make applications, including the identification of a bail address if needed.</li> </ul>
91. Women benefit from access to specialist units which provide treatment and a regime which meets their assessed needs.	We recommend rewording bullet point seven to read: <ul style="list-style-type: none"> <li>• Women contribute to their care and treatment plan and reviews which take place regularly and include involvement of family or significant others where appropriate and when consent has been given.</li> </ul>
92. Women are located in prisons that provide all the necessary support to address their offending behaviour and resettlement needs and that are as close to home as possible.	In the second bullet point: <ul style="list-style-type: none"> <li>• Allocation decisions are based on proximity to home, caring responsibilities and the availability of resettlement interventions to meet need.</li> </ul> We note that significant relationships within the prison should also be considered.
97. Prior to release, women are encouraged to address any remaining rehabilitation and resettlement needs, with help from all staff and in partnership with the community-based offender manager.	Bullet point seven: <ul style="list-style-type: none"> <li>• Women receive comprehensive help and advice aimed at improving compliance with licence conditions and preventing recall. This includes an explanation of the conditions and an opportunity to discuss their rights and responsibilities before release.</li> </ul> We recommend the opportunity to discuss rights and responsibilities should be opt-out rather than opt-in. Explanation of licence conditions should be thorough, and in language that the person understands. Staff should ensure they understand what is expected of them and give them the opportunity to ask any questions.
98. Women are given all necessary practical and	The final bullet point:

emotional support for release and are supported on the day of release.

- Suitable clothes and bags are available to those being discharged who do not have them.

This clothing should not appear to be prison-issue. As mentioned previously, clothing and footwear should be available in a wide range of sizes and styles (these styles include more traditionally 'masculine' clothing and footwear).

Please send your response to [caroline.wright@hmiprisons.gov.uk](mailto:caroline.wright@hmiprisons.gov.uk) by **31 December 2020**. This information is available on our website.