

Prison Reform Trust response to Islington Council 'Developing plans for the Holloway Prison site: a discussion paper'

The Prison Reform Trust (PRT) is an independent UK charity working to create a just, humane and effective penal system. We do this by inquiring into the workings of the system; informing prisoners, staff and the wider public; and by influencing Parliament, government and officials towards reform.

The Prison Reform Trust provides the secretariat to the All Party Parliamentary Penal Affairs Group and has an advice and information service for people in prison.

The Prison Reform Trust's main objectives are:

- reducing unnecessary imprisonment and promoting community solutions to crime;
- improving treatment and conditions for prisoners and their families.

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 has renewed its drive to reduce women's imprisonment with a UK-wide programme, 'Transforming Lives: reducing women's imprisonment', running from 2015-18.

<http://www.prisonreformtrust.org.uk/>

Introduction

The Prison Reform Trust welcomes the publication of the 'Developing plans for the Holloway Prison site: a discussion paper' and the opportunity to contribute our views at this early stage prior to the publication of a Supplementary Planning Document (SPD) setting out planning guidance for the HMP Holloway site.

We recognise that the sale and development of the HMP Holloway site will require a careful balance between the legitimate need to recoup maximum value for the tax payer, ensure adequate provision of social housing and satisfy the planning objectives set out in the Local Plan for the London Borough of Islington. Our central argument is that during the planning process we must not lose sight of the history of HMP Holloway as both the first female-only prison in the country and the biggest women's jail in Western Europe. It has housed many thousands of vulnerable and disadvantaged women in the course of its history, and although rebuilt since then it is well-known as the prison where suffragettes were incarcerated and force fed. Its role and reputation in the long struggle for women's equality warrant more than a plaque. Its closure is a matter for celebration, but only if its legacy includes a modern and humane contribution to the continuing struggle to eliminate the disadvantage and discrimination that leads so many into crime and ultimately to prison.

In our response, we have therefore focused on the pressing need to ensure that the redevelopment of the HMP Holloway site delivers effective, alternative community provision for vulnerable women, including those in contact with the criminal justice system. Our response builds upon previous work by the Prison Reform Trust. On the 1 December 2015, the Prison Reform Trust wrote to the then Secretary of State for Justice, following his announcement of the closure of HMP Holloway, with a challenging proposal to work with strategic partners including MOPAC, Islington London Borough Council, NHS London, the Metropolitan Police, London Community Rehabilitation Company and women's voluntary organisations to retain the HMP Holloway visitors centre (a purpose built space refurbished by the Tudor Trust) as a women's centre. A site which could offer holistic support and supervision for women in the justice system, and provide a strategically important community disposal option for North London courts. Since the original proposal was made to the Secretary of State, PRT has held a series of exploratory meetings with key strategic leads in London, including the Metropolitan Police Commissioner, Deputy Mayor for Policing and Crime and many local Members of Parliament.

1. Site History and Prison Reform

The discussion paper provides important background information on the history of the Holloway site, the reason for the sites closure and the wider context of prison reform. However, we are concerned that as currently worded the reference to the MOJ prison estate modernisation programme does not adequately capture the governments distinct priorities for women offenders (as opposed to men). In November 2016, the Ministry of Justice published a new White Paper 'Prison Safety and Reform' setting out a commitment to *'build and open five new community prisons for women'* and *'publish a strategy setting out how we will improve the treatment of female offenders in custody and in the community. This will look at how we can reduce the number of women offending and ending up in custody, including through early and targeted interventions.'* These commitments have potentially significant implications for local infrastructure in Islington and North East London as many of the women previously held in HMP Holloway will now be managed in the community. This is likely to place additional demands on housing, substance misuse, mental health, children's services and other social care providers.

Moreover, we would also stress that the closure of HMP Holloway should not be considered in isolation from other developments in London, both historical and contemporary:

- At present London compares extremely unfavourably with other major urban centres in the provision of holistic and gender-informed services for women and currently lacks the operational capacity to provide additional women's services following the closure of HMP Holloway. In 2014/15 the 1,266 women sentenced to a community order in Greater Manchester had access to a network of ten local women's centres representing a caseload of 126 offenders per centre. In contrast the 2,528 women offenders issued community orders in London could notionally access the Beth Centre in Lambeth and Advance Minerva in Hammersmith. A caseload of approximately 632 offenders per centre which does not adequately reflect the limited catchment areas of these centres.
- With the closure of HMP Holloway, there is a severe lack of physical capital in London (especially North East London) where women can access effective, gender informed services that get to the root causes of their offending. The sale of HMP Holloway offers a unique opportunity to reverse this legacy of underinvestment and ensure that women in London are able to access the same levels of community support that are now provided in Greater Manchester and elsewhere as a matter of course.
- More recently the Mayor of London has made clear in the revised Police and Crime Plan that: *'Women and girls in the Criminal Justice Service have very specific needs that we have an obligation to meet. Female offenders need services that are specifically tailored to these needs and their circumstances. These might be issues connected to their home lives if they are primary carers, or specific mental and other health needs. Wherever possible, we will seek to divert low-risk women from the formal criminal justice processes. We will achieve this by working with the MPS to design and pilot a police-led triage service that, where appropriate will divert these women into specialist support services'*.
- It is difficult to calculate the cashable savings from the sale of HMP Holloway with a high degree of confidence but at the 1 March 2016 MOPAC challenge meeting, chaired by the then Deputy Mayor for Policing Stephen Greenhalgh, the financial costs associated with the closure of HMP Holloway were discussed at length. During his evidence Graeme Gordon (MOPAC Director of Services and Commissioning) confirmed that, *'on the basis of what a place in Holloway costs, which is £38,676 a year that would imply a potential saving of £5.4 million that could be reinvested elsewhere'*.

2. Site context and planning constraints

We have nothing further to add to this section.

3. Future Uses

We welcome and commend Islington Council for recognising that the existing land-use of the site, as a prison, should be considered a community use, part of the social infrastructure of the borough and London.

Our analysis suggests that the closure of HMP Holloway and the commitments set out in the government White Paper will have significant implications for services in Islington and London as a whole. In January 2014, PRT convened a high-level roundtable at HMP Holloway with representation from women in HMP Holloway, the then HM Chief Inspector of Prisons, the Chief Executive of NOMS, Chief Executive of Islington Council and the Chairman of the Magistrates Association. Amongst other things the roundtable found that many women, particularly those in North East London, do not have access to a women's centre offering a range of services, supervision and support. Many have to travel a significant distance across London to gain access to services at either the Beth Centre in Lambeth or Advance Minerva in Hammersmith. This inevitably impacts upon both the range and quality of interventions that can be offered to women by the Local Authority, Health, Police, NPS/CRC in North East London. A number of women's voluntary organisations and community groups supported women in HMP Holloway, with some providing 'Through-the-Gate' services and support on release. While a few of these services were able to transfer their services to HMP Bronzefield and HMP Downview, many are small specialist charities or members of the Friends Group established by former governor, Julia Killick, who became 'unplugged' when Holloway closed its doors in June 2016.

With the closure of HMP Holloway there is a pressing need for alternative community use in Islington. We have proposed that a percentage of the proceeds from the sale of the Holloway site must be reinvested in community services, ideally a women's centre providing a mix of universal and targeted services to vulnerable women, including those at risk of entering the criminal justice system. We believe the women's centre model, ideally with provision of secure accommodation, represents the most effective, and financially sustainable alternative community use for three main reasons:

- a) The legacy argument: The closure of HMP Holloway sends a clear message to the courts that prison is not the place for vulnerable women who have committed low-level, non-violent offences and who have so often been victims of domestic violence and sexual abuse themselves. To secure a genuine legacy for the site, for staff and the women who were held at HMP Holloway, it is essential that those words are followed up with meaningful investment in women's services. As one senior figure at HMP Holloway put it a women's centre on the site 'would give us all heart' and offers a once in a generation opportunity for the government to realise its longstanding commitment to improve treatment of women in the criminal justice system.
- b) The justice re-investment argument: 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 and financial management, employment, education and skills development. The average cost of keeping a woman in HMP Holloway for one year is in the region of £38k. In contrast, the average cost of a community order is £2,800 and approximately £1,500 for support in a women's centre. HMP Holloway is expected to generate a significant sale value and it would require only a small reinvestment of these proceeds to deliver effective community alternatives that enable women to take control of their lives, care for their children and address the causes of their offending.
- c) The operational argument: If the government is successful in reducing the women's prison population and making greater use of non-custodial alternatives in London, there will be a pressing need for greater options in the community that command the confidence of the courts. At present these services do not operate at this scale in North East London and there is a real danger that, if the courts continue to make use of current levels of custodial sentences, more women will end up in prison further away from their homes causing disruption to family life and placing significant pressure on local services such as housing when they return. Our initial analysis of the Holloway prison population suggests that a women's centre in North East London offering holistic services would contribute to the very small shifts in the treatment of remand prisoners, those serving very short sentences (particularly for those serving sentences of under three months) and use

of electronic monitoring for those serving 1-4 years required to fundamentally alter the criminal justice landscape for women in London.

4. Design

Our assessment of the site suggests that the footprint of the HMP Holloway Visitors Centre is approximately 150 – 160m². This is comparable in size to the Anawim Centre in Birmingham that delivers a range of services to approximately 400 women per year and has recently opened a new sheltered accommodation facility on the site of the existing women's centre. Given a site of this size we believe it would be possible to deliver a significant community hub providing a range of women's services alongside social housing for the wider benefit of the community. A detailed design specification for a women's centre is set out at Annex A. This is based upon data from comparably sized women's centres elsewhere in the United Kingdom and best practice evidence for delivering gender-informed services to women.

To ensure continuity of service to women in Islington during the development of the Holloway site we believe there are advantages to staggering the development of the HMP Holloway site as follows:

- Short-term: It is likely that the sale of HMP Holloway and subsequent clearing of the site will take a considerable period of time. While this is undertaken PRT proposes that the visitors' centre is retained in the short term and converted into a women's centre to provide much needed gender-specific services for women in North East London as services transition to the women's cohort model established following the introduction of Transforming Rehabilitation. Reflecting wider learning from the Manchester 'whole systems approach', the IOM Cymru Women's Pathfinder, and recent MOJ 'whole systems' grant funding, this Centre could receive voluntary admissions, police referrals at the point of arrest, community orders and those on licence following their release from prison.
- Medium-term: We propose that the visitors' centre, which is already physically split off from the main prison estate by an entry road through the site, is hived off and re-developed with a requirement that it includes adequate community use for women. We understand that housing in this part of the London Borough of Islington is dense and new developments tend to be 8-10 floors in height. Separating off the visitors' centre site would allow for the site to be sold and developed as a distinct mixed use development incorporating a women's centre, sheltered accommodation and social housing for women on the upper floors.
- Long-term: While the sale and development of the site is undertaken, it would be necessary to find an interim site for the 2-3 years that the site is being developed. On completion of the property a range of public sector and voluntary sector organisations would migrate into the new purpose-built building providing a range of gender-informed criminal justice, health and social care interventions.

5. Delivery

We have nothing further to add to this section.

6. Key planning and development objectives

Establishing a key set of development principles will be critical in providing clarity about the outcomes required from the future development of the site. For the reasons set out in this consultation response the Prison Reform Trust believe that the Supplementary Planning Document (SPD) should create a clear expectation that the development of the HMP Holloway site will include community provision for women, ideally in the form of a women's centre, providing a mix of universal and targeted services for vulnerable women, including those at risk of entering the criminal justice system.

The opportunity exists to make a radical improvement in the services offered to a highly vulnerable group of women and we hope the planning process will provide the focal point for Islington London Borough Council, MOPAC, NHS London, the Metropolitan Police, London Community Rehabilitation Company and women's voluntary organisations to seize the opportunities set out here, to improve outcomes for vulnerable women, the communities they are part of and taxpayers alike.

Annex A: General Design Specification for a Women's Centre

<p><u>General</u></p>	<ul style="list-style-type: none"> ▪ Alarm system ▪ Phone line ▪ Reception area with desk, computer, chair, phone ▪ Leaflet stand/pin-board
<p><u>Kitchen</u> To provide women and children with warm, cooked food if it needed; Provide cooking lessons for women to learn the skills to provide for themselves and their families on a budget.</p>	<ul style="list-style-type: none"> ▪ Oven ▪ Fridge freezer ▪ Microwave ▪ Kitchen appliances ▪ Kettle ▪ Counter-top space ▪ Large washing machine and tumble dryer
<p><u>Flexible space</u> An empty room allows flexibility for different classes and group work for instance, group counselling could be held there but so could exercise classes/creative workshops; Projector and screen would allow screening of movies or presentations; Group meals could also be served here</p>	<ul style="list-style-type: none"> ▪ 50+ chairs ▪ 20+ tables (fit for 6 people) ▪ Projector and screen
<p><u>IT and library room</u> Computer training sessions to help people find jobs and update CVs; Help women use the internet to contact vital services; Books available for all-ages to borrow; Complete education coursework</p>	<ul style="list-style-type: none"> ▪ Six computers ▪ Handy guides for using computers and the internet ▪ Books available for all ages: fiction, factual, and help/skill books ▪ Printer/photo-copier
<p><u>Counselling rooms</u> Could also be used by linked voluntary organisations providing debt advice, skills training etc</p>	<ul style="list-style-type: none"> ▪ Six counselling rooms ▪ Filing cabinets ▪ Three armchairs in each room
<p><u>Creche</u></p>	<ul style="list-style-type: none"> ▪ 4 cots for young babies ▪ Mat space for toddlers to nap ▪ TV with DVD for older children to watch TV ▪ Chairs and tables for 10 children
<p><u>Offices</u></p>	<ul style="list-style-type: none"> ▪ Three offices providing housing, debt, and other specific advice by officers
<p><u>Outside</u> Gates and intercom would allow women to feel safe and secure at the women's centre, it would also mean that children could play in the grounds without wandering off; Seating space and tables creates a social space outside for the women; Children's playground would allow children to play outside in a safe environment Women and children could gain gardening skills as well as learn about sustainability with an allotment and greenhouses</p>	<ul style="list-style-type: none"> ▪ Gates and intercom ▪ Outdoor seating space and tables ▪ Children's playground with sandpit ▪ Garden inc. allotments and greenhouses
<p><u>Bathroom (with separate toilet facilities)</u></p>	<ul style="list-style-type: none"> ▪ With shower and bath ▪ Fresh towels ▪ Sanitary products and toiletries
<p><u>Lounge area</u></p>	<ul style="list-style-type: none"> ▪ Sofas and arm chairs ▪ Television with DVD player