

April 2018



CLINKS
RESPONSE

Clinks response to the National Institute for Health and Care Excellence (NICE) consultation on guidance on preventing suicide in community and custodial or detention settings

About Clinks

Clinks is the national infrastructure organisation supporting voluntary sector organisations working in the criminal justice system. Our aim is to ensure the sector and those with whom it works are informed and engaged in order to transform the lives of people in the criminal justice system and their communities. We do this by providing specialist information and support, with a particular focus on smaller voluntary sector organisations, to inform them about changes in policy and commissioning, to help them build effective partnerships and provide innovative services that respond directly to the needs of their users.

We are a membership organisation with over 500 members, working in prisons and community settings, including the voluntary sector's largest providers as well as its smallest. Our wider national network reaches 4,000 voluntary sector contacts. Overall, through our weekly e-bulletin Light Lunch and our social media activity, we have a network of over 15,000 contacts. These include individuals and agencies with an interest in the criminal justice system and the role of the voluntary sector in rehabilitation and resettlement. For more information see www.clinks.org

About this submission

National Institute for Health and Care Excellence (NICE) has created draft guidance on preventing suicide in community and custodial or detention settings. This consultation response comments on the guidance. The guidance includes recommendations for research, based on existing evidence. Literature reviews produced by NICE of existing evidence are set out in nine evidence review documents that accompany the consultation.

To inform this submission Clinks has drawn on previous work by: the Reducing Reoffending Third Sector Advisory Group to the Ministry of Justice, for which Clinks provides the chair and secretariat; the Voluntary Community and Social Enterprise (VCSE) Health and Wellbeing Alliance, of which Clinks is a member; and the National Criminal Justice Arts Alliance, which Clinks manages.

In February 2017 Clinks published a paper which set out recommendations on how to improve care and support for people at risk of suicide and self-harm in prison. The paper was an output of a special interest group of the Reducing Reoffending Third Sector Advisory Group (RR3) which focused on suicide and self-harm. The RR3 exists

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with the purpose of building a strong and effective partnership between the voluntary sector, the Ministry of Justice, and Her Majesty's Prison and Probation Service to reduce re-offending.

The special interest group on suicide and self-harm brought together representatives from voluntary organisations providing a wide range of services and support to people in prison and their families. The group explored the role and contribution of the voluntary sector in providing care for people at risk of suicide and self-harm in prison, and the challenges and barriers to effective care and support.

Through Clinks membership of the Voluntary Community and Social Enterprise (VCSE) Health and Wellbeing Alliance, which is a partnership between the Department of Health, NHS England and Public Health England, and 21 national voluntary sector organisations and consortia, we work to bring the voice of the sector and people with lived experience into national policy making, to promote equality and reduce health inequalities. In this role Clinks works together with Nacro to raise awareness of the health needs of people in the criminal justice system, and the vital role the voluntary sector can play in addressing them. Clinks also manages the National Criminal Justice Arts Alliance, which is a coalition of nearly 800 artists, arts organisations, prison staff and academics working in the criminal justice sector using creative approaches to reduce reoffending. Its aim is to ensure all offenders have access to arts opportunities as a springboard to positive change.

NICE asked for submissions to be provided in a specific format, which we have simplified and reproduced here. The table below sets out our views on the draft guidance content by page and line.

Draft guidance content	Comment
Recommendation 1.1.2 Page 4, line 14	We strongly support the inclusion of the voluntary sector in suicide prevention partnerships. In order to ensure that this includes voluntary sector organisations working in criminal justice it should be made more specific to read: voluntary and other third sector organisations including those working with people who have had contact with, or are at risk of having contact with, the criminal justice system.
Recommendation 1.1.2 Page 4, line 17	We agree that criminal justice services should be included in suicide prevention partnerships but what is meant by criminal justice services should be clarified to ensure all services working in criminal justice are included. This should read: criminal justice services, including Community Rehabilitation Companies, the National Probation Service, prisons, police and courts.



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<p>Recommendation 1.1.3</p> <p>Page 5, line 3</p>	<p>We support the inclusion of voluntary and other third-sector organisations in multi-agency partnerships for suicide prevention in custodial or detention settings. The voluntary sector are important partners to help support a safer, more rehabilitative culture. Through their work with people in contact with the criminal justice system, voluntary sector organisations often have better contact and relationships with people who are seen as ‘hard to reach’ and therefore can act as an important source of information as to who might be at risk and therefore need additional support. To do this the sector needs to be seen as an integral part of the system. However, due to resource pressures in custodial and detention settings, there are often challenges to implementing this kind of partnership working.</p> <p>Between September 2016 and October 2017 Clinks supported a voluntary sector member of staff in three prisons to implement a bespoke model of voluntary sector coordination reflective of the needs of each prison’s population. This helped contribute to a safer prison environment in two key ways.</p> <p>Firstly, the project improved information about and access to support services for prisoners. HMP Exeter now includes the voluntary sector directory in all its Assessment, Care, Custody and Teamwork documents. This gives staff immediate access to information on support services that can contribute to care plans.</p> <p>Secondly, the project ensured that partners have a good knowledge of safer custody processes and procedures. It did this through establishing formalised induction processes and regular training for voluntary sector staff and volunteers. At HMP Dartmoor the project encouraged the introduction of a computer located outside the prison in the Prison Officer Association Learning Centre where voluntary sector staff could access information about policies, such as the health and safety policy.¹</p>
<p>Recommendation 1.1.3</p> <p>Page 5, line 4</p>	<p>For clarity we would suggest that the guidelines specify what is meant by transition services and should specify through the gate services for people leaving prison. It should read: probationary services including through the gate services for people leaving prison.</p>



<p>Recommendation 1.1.3 Page 5, line 5</p>	<p>Multi-agency partnerships should also include people who have lived experience of the criminal justice system and their families. There should be another bullet point which reads: people with experience of the criminal justice system including custodial and community settings.</p> <p>The voluntary sector is a good vehicle for involving the people and families who have experience of the criminal justice system and those who have attempted or been affected by suicide in these settings. These ‘experts by experience’ are a vital source of intelligence about how the system can be safeguarded to protect against suicide and self-harm. Clinks has published case studies of voluntary sector organisations involving people with lived experience of the criminal justice system, which highlight the added value that this involvement can have in developing and commissioning services.²</p>
<p>Recommendation 1.1.4 Page 5, line 6</p>	<p>We strongly support the custodial or detention setting’s partnership linking with relevant multi-agency partnerships in the community, especially given recent evidence of the rise in suicide rates among people recently released from prison. It is important for people to receive continuity of care as they move from prison into the community and for this to be properly considered by those providing through the gate services.</p>
<p>Recommendation 1.2.1 Page 5, line 11</p>	<p>We suggest that further specified detail is included in the bullet points regarding suicide prevention strategies in custodial settings. In a custodial setting, there should be a person responsible for suicide prevention of all staff and prisoners in the setting. They should be the first point of call if someone has a concern that someone is at risk of suicide and everybody who works in the setting (including people from outside organisations that come into the prison) must be aware of who this person is.</p> <p>In our paper on how to improve care and support for people at risk of suicide and self-harm in prison, we recommend that every contact and every relationship should count. Every person who comes into contact with a person who may be at risk of self-harm or suicide in prison needs to know how to respond, who to tell if they have concerns, and what support is available.³</p>



<p>Recommendation 1.2.1 Page 5, line 12</p>	<p>We agree with this. Stakeholder engagement must include the voluntary sector and this should be specified as in our experience they are often forgotten in partnership arrangements, especially in custodial settings. Voluntary sector organisations need to be an integral part of the prison system as they are a key partner in keeping people safe. The voluntary sector can bring professional expertise, energy, resource and creativity to bear and encourage a positive prison culture more conducive to safety and rehabilitation.⁴ This should read: Engage with stakeholders, including the voluntary sector, to share experience and knowledge.</p>
<p>Recommendation 1.2.1 Page 5, line 13</p>	<p>It should be made clear how mapping suicide prevention activities in the suicide prevention plan should be implemented in a custodial setting. It should say: Map stakeholders and their suicide prevention activities. In custodial settings this should involve a clear plan of who is responsible for supporting people at different risk points. These include: reception and first night staff when a person first arrives in prison and dedicated officers once a person is transferred to a standard wing. Other prison department staff, healthcare and voluntary sector services, volunteers and peer supporters also need to be included and supported to understand relevant policies and procedures.</p> <p>There needs to be an understanding that risk is dynamic and any person can become vulnerable, regardless of whether they have previously been assessed as at risk. These are recommendations we make in our paper on how to improve care and support for people at risk of suicide and self-harm in prison.⁵</p>
<p>Recommendation 1.2.1 Page 5, line 19</p>	<p>This should be amended to also include previous successful initiatives. There are many successful initiatives which have worked well in the past to help in keeping people safe, as well as innovative approaches being developed now. We need to look at the evidence we already have for what works, and how to revive or scale these up.⁶ It should say: Assess whether initiatives successfully adopted elsewhere are appropriate locally or can be adapted to local needs or whether previously successful initiatives can be reintroduced.</p>

<p>Recommendation 1.2.1 Page 5, line 26</p>	<p>There should be an additional bullet point to say: Consider how to measure activities to prevent suicides, with a focus on encouraging and incentivising positive activities rather than simple measurement of suicide numbers.</p> <p>Simply measuring the rates of self-harm and suicide at different establishments risks creating perverse incentives. Positive measures such as the number of peer supporters employed; number of staff receiving mental health training; or health and social care qualifications awarded, encourage investment in those things which are known to be effective in caring for people at risk of suicide and self-harm.⁷ Arts interventions are also important preventative mechanisms, giving people an improved sense of wellbeing and sense of worth. In May 2014, the National Criminal Justice Arts Alliance carried out a survey of people in prison about their views on the use of arts in custody. One person said: “Art [...] is also a great help for someone like me who has attempted suicide in prison and I am a self-harmer at times. Art relieves me of a lot of stress and is also a form of escapism. Much better than any drug”.⁸</p>
<p>Recommendation 1.3.1 Page 6, line 15</p>	<p>This should include specific reference to the voluntary sector. Both the statutory sector and the voluntary sector have data that would be useful for each other but voluntary sector organisations are often excluded from data sharing arrangements. It should say: Share data between stakeholders, including the voluntary sector, so they can identify local characteristics and needs.</p>
<p>Recommendation 1.4.1 Page 7, lines 9-11</p>	<p>There may also be opportunities to consider data from voluntary sector sources and multi-agency partnerships should work with voluntary sector organisations to explore the best mechanism for gathering this information.</p> <p>This should read: Carry out periodic audits to collect and analyse local data from different sources, for example reports from local ombudsman, and coroner, prison and probation ombudsman reports and the voluntary sector.</p>
<p>Recommendation 1.4.4 Page 7, line 27</p>	<p>There should be an additional point at the end of this which says: Data and reports should be shared with relevant organisations, including voluntary organisations that work with people in prison or those on probation licence.</p> <p>This will enable them to better support the people they work with.</p>



<p>Recommendation 1.7.1 Page 10, lines 12-13</p>	<p>Voluntary sector staff and volunteers working in prison, who may not be employees of the prison itself, should receive suicide awareness and prevention training. The Good Prisons Project, where Clinks supported a voluntary sector member of staff in three prisons between September 2016 and October 2017, showed what an impact this can have. The project ensured that voluntary sector staff and volunteers working in prison had a good knowledge of safer custody processes and procedures, through establishing formalised induction processes and regular training.⁹</p> <p>1.7.1 should read: Ensure suicide awareness and prevention training is provided for people who work with high-risk groups or at places where suicide is more likely, including voluntary sector workers and volunteers.</p>
<p>Recommendation 1.7.2 Page 10, lines 17-18</p>	<p>There should be two additional bullet points here: manage their own health and well-being; and understand safeguarding and the impact of trauma on people's lives and how it presents in terms of mental health.</p> <p>People supporting people in prison being able to manage their own health and well-being and understand the impact of trauma will impact the quality of services provided to people in prison.</p>
<p>Recommendation 1.7.4 Page 10, lines 22-23</p>	<p>This should be strengthened and made clear how this should be implemented in a custodial setting. It should read: Every gatekeeper should have training which sets out how to recognise signs that someone is at risk and what action to take to support them. In custodial settings, every person who comes into contact with a person who may be at risk of self-harm or suicide in prison needs to know how to respond, who to tell if they have concerns, and what support is available.¹⁰</p>
<p>Recommendation 1.7.5 Page 11, lines 1-2</p>	<p>A line should be added which reads: As well as training, prison officers need support in managing their own health and wellbeing, and in their role in caring for vulnerable people.</p> <p>This will have a direct impact on service users within the prison.¹¹ The system is under particular pressure at the moment in terms of staff shortages¹², although the Ministry of Justice has committed to raising the number of prison officers to 2,500 by the end of 2018.¹³</p>



Clinks supports, represents and campaigns for the voluntary sector working with offenders. Clinks aims to ensure the sector and all those with whom they work, are informed and engaged in order to transform the lives of offenders.

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End notes

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