



supporting voluntary organisations that  
work with offenders and their families

Tavis House  
1-6 Tavistock Square  
London WC1H 9NA

t 020 7383 0966  
info@clinks.org  
www.clinks.org

Secure College Rules Team  
Ministry of Justice  
8.19  
102 Petty France  
London SW1H 9AJ

21 November 2014

To whom it may concern,

### **RE: Plans for Secure College Rules consultation**

Clinks is the national infrastructure organisation supporting Voluntary Sector organisations working with offenders and their families. Our aim is to ensure that the sector and all those with whom it works, are informed and engaged in order to transform the lives of offenders and their communities. We also manage the National Alliance for Arts in Criminal Justice, which is a coalition of 370 members who work across art forms in a range of custodial settings and is jointly funded by the Ministry of Justice and Monument Trust.

[Clinks' response to Transforming Youth Custody](#), in April 2013, drew on direct submissions from our members; it also benefited from the help and advice of the National Alliance for Arts in Criminal Justice management committee members, and drew on case studies from the Arts Evidence Library.

In response to this consultation, Clinks and the National Alliance for Arts in Criminal Justice endorse the submission of the Prisoner Learning Alliance (PLA) of which we are a member. The PLA submission responds mainly to questions 1-7, because questions 7 onwards deal with how the secure college will be run as a custodial establishment. The PLA response also endorses the views of the Children's Rights Alliance England and the Standing Committee on Youth Justice on these points, which we in turn also support.

In addition to PLA's submission we wish to draw particular attention to a number of points in relation to key headings in the consultation.

### **The purpose of secure colleges and regime**

We welcome the proposed purpose of secure colleges to "equip young offenders with the skills they need to stop offending and to become law-abiding members of society". We also welcome the intention that secure colleges "will put high quality education at the core of a regime which both educates and provides rehabilitative services for young people".

### **A wide-ranging curriculum**

As we said in our original response, education for young people in custody should be as much about personal development as the acquisition of skills or knowledge. We were therefore pleased to see an acknowledgement that "Educational activities may include academic study, such as the development of core skills like literacy and numeracy, vocational training, the development of life skills, and activities to tackle offending behaviour and equip young people with the skills to lead crime-free lives."

**Chair** Dame Anne Owers      **Director** Clive Martin

Registered office: Tavis House, 1-6 Tavistock Square, London WC1H 9NA    Registered charity no. 1074546    Registered company no. 3562176

This commitment to a wide-ranging curriculum is vital to ensure that educational activities are truly engaging. Many young people who come into contact with the Criminal Justice System need to develop qualities and skills such as resilience, self-confidence, communication and team-work. Not only are these wider life skills critical for challenging offender behaviour, but they can also act as a foundation or stepping stone on the path to engaging with more traditional forms of learning.

A significant number of voluntary sector organisations excel at providing education services which encompass more creative approaches to learning, often making use of the arts or sport to engage young people and complement more traditional learning methods. In particular, the National Alliance for Arts and Criminal Justice would like to highlight soon-to-be published research by leading arts in youth custody provider Unitas, who run the Summer Arts College (SAC). SACs first ran in 2007, and have continued every year since then. By 2012, a total of 75 YOTs and 1,821 young people had participated.

The findings indicate statistically significant gains in both literacy and numeracy scores for SAC participants. Over two thirds of the young people who completed the SAC programme increased their literacy and numeracy skills (70% for literacy and 69% for numeracy), and one third of the young people moved up a level in literacy and numeracy.

For this reason, we consider it essential that the 30-hour requirement for educational activity is appropriately matched to individual learning needs in order to emphasise the quality of learning as well as the quantity, and to make the best use of the available provision.

## **Equalities**

The consultation rightly recognises the over-representation of young people with certain protected characteristics within the youth estate. We would also point to the fact that young people with protected characteristics (Gypsy, traveller, Roma and Afro- Caribbean boys) are over-represented in exclusions from school and as looked-after children (all BAME groups and in particular mixed origin).

In addition, NOMS equalities data shows that black and mixed-origin service users are subject to higher rates of adjudication, and the rate of adjudications is highest for 15-17 year olds overall. While public data is not available for 15-17 year old BAME offenders, we would suggest that the Ministry of Justice examine the data to see if race and ethnicity have an effect on the likelihood of adjudications within this age group.

These wider experiences of disadvantage and unequal outcomes for this group of offenders have the potential to affect their engagement with education in secure colleges, as well as their health, welfare and safety needs. We therefore question the assertion in the consultation that these rules will not have a disproportionate impact and suggest that further exploration is needed to ascertain whether there are specific educational, health, welfare or safety needs for young people with protected characteristics. This could be helpfully informed by the work that the Youth Justice Board is doing on these issues, and the work Clinks has done in partnership with the Black Training and Enterprise Group (BTEG) in support of Baroness Young's Review into improving outcomes for young black and/or Muslim men in the criminal justice system.

In conclusion, both Clinks and the National Alliance for Arts in Criminal Justice welcome the opportunity to respond to this consultation, and look forward to further engagement on these important issues.

Yours sincerely,

J. S. Mullen



Jessica Mullen, Senior Projects and Policy Officer, Clinks  
Jessica Plant, National Alliance for Arts in Criminal Justice Manager