

July 2019



CLINKS  
RESPONSE

# Clinks submission to the Justice Select Committee's Prison Governance inquiry

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## About Clinks

Clinks is the national infrastructure organisation supporting voluntary sector organisations working in the criminal justice system (CJS). 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 CJS 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, 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 CJS and the role of the voluntary sector in rehabilitation and resettlement.

Clinks manages the National Criminal Justice Arts Alliance, a national network of over 800 artists, arts organisations and criminal justice practitioners using creative approaches to reduce reoffending. We also support a network of women's centres and specialist women's services working in the CJS.

## About this response

Clinks welcomes the opportunity to respond to this consultation and have answered the questions of most relevance to the work and expertise of our members. Unfortunately, the timescale for responding to the inquiry have been prohibitive for us to engage specifically with our members but we have used information garnered from ongoing dialogue with them to inform our response.

## Summary of recommendations

- Clinks recommends that the Ministry of Justice (MoJ) proactively works to consult with voluntary organisations in the development of policy reform and whilst doing so adheres to the principles in *The Compact*.<sup>1</sup>
- Clinks recommends that HM Prisons and Probation Service (HMPPS) create opportunities for engagement with specialist voluntary sector organisations in the development and delivery of diversity training for prison staff.

- Clinks recommends key performance indicators are developed for prisons, in partnership with prison governors, and with input from other stakeholders including voluntary organisations and people with experience of the prison system, to ensure consistency across the estate.
- Clinks recommends HMPPS adopt the census categories in its data recording practices to provide a more accurate picture and understanding of the outcomes black, Asian and minority ethnic (BAME) people experience. Data should be recorded in its most disaggregate form to help improve policy and practices in prison. If this does not produce sufficiently robust data, for publication it can be aggregated into larger categories.
- HMPPS have taken important, proactive steps to improving the collection of use of force data, but given the severity of the issues outlined by the Chief Inspector of Prisons the challenges the data identify need to be addressed without delay.
- Clinks recommends that HMPPS proactively work to collect and respond to the views of people with lived experience of the CJS to understand the impact of the trends shown through quantitative data on people in prison and to develop policy solutions to them.
- Clinks recommends that every prison should consider adopting the voluntary sector coordination model, either in full or by tailoring the examples of good practice to meet individual prison needs.
- Clinks recommends there be shared outcome measures between prison and probation services to encourage full cooperation between them.
- Clinks recommends the MoJ take proactive steps to address the challenges with the Dynamic Purchasing System (DPS) to ensure full and proper commissioning of small, specialist voluntary sector services.
- It is imperative that the lessons learnt from the development and implementation of the DPS are reflected in the development of the newly proposed dynamic framework for resettlement and rehabilitative interventions.
- Clinks supports the MoJ's intention to develop and run consultation events with partners to inform the development of the dynamic framework. We recommend that this engagement is ongoing to ensure voluntary sector partners can support the MoJ fully in the development of the dynamic framework.

## **Q1: What should the role for a prison governor be, what should they be responsible for and to whom are they accountable?**

### **a. What changes have been made since the Government's White Paper 'Prison Safety and Reform' and what have been the challenges and opportunities in implementing these?**

Clinks welcomed the greater freedoms given to the executive governors of the six early adopter reform prisons, which initially resulted in clear efforts to re-think regimes and to engage more fully with voluntary sector organisations and other community partners. However the momentum behind the original reform prisons has all but disappeared and creating change on a wider scale across the prison estate has been hampered by political turbulence, a lack of strategic oversight, and a lack of resource to address the growing prison population and ageing infrastructure.

In addition to the 2016 White Paper and its accompanying legislation – the Prisons and Courts Bill 2016-17 – falling at the last election, there has been significant political instability, which has resulted in three different secretaries of state for justice and three



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different ministers with oversight of prisons. Whilst each minister has committed to pursue the policy outlined by the White Paper, they have brought different agendas, priorities and emphasis to their roles. Priorities and strategic direction may change yet again with the appointment of a new Minister of State for MoJ, Robert Buckland QC MP.

The lack of accompanying legislation and the churn of ministers has made clear progress towards strategic goals of the White Paper challenging. It has created further challenges for voluntary organisations, at both a strategic and operational level as they respond to the changing policy direction and priorities implemented from different government ministers.

Within government, this lack of strategic oversight and clear direction has led to an inconsistent approach taken by MoJ in relation to the development and implementation of a range of different strategies. Many strategies, including the *Female Offender Strategy*,<sup>2</sup> were significantly delayed and when published often under resourced. Strategies published by the department lack detail on the outcomes they are seeking to achieve, exactly how implementation will happen, at what stage and how they will be measured and how they join up and complement each other. Further, the financial envelope needed to achieve the expressed aims of the strategies are often lacking. As a result, the implementation of these various strategies has been siloed and inconsistent, limiting their potential impact and making them challenging to implement.

The way in which these strategies have been developed, implemented and taken forward has also seen inconsistent engagement and consultation with the voluntary sector. For example, the *Education and Employment Strategy*<sup>3</sup> was publicly launched with no formal consultation to support its development. According to Clinks' State of the Sector research, 43% of voluntary organisations work in education and learning and 38% provide employment support and/or placements.<sup>4</sup> These organisations play a vital role in supporting people with convictions into employment and provide a range of services from training and education to improve employability, support through job application and recruitment processes, helping individuals to access their rights as employees, and support meeting people's wider needs to enable them to sustain employment. Failing to tap into the significant pool of knowledge and expertise these organisations collectively have is a missed opportunity.

A further example of the expertise that the sector can contribute in this area is a recently convened Special Interest Group of the Reducing Reoffending Third Sector Advisory Group<sup>5</sup> on employment support for people in contact with the CJS. This group will provide advice to the government on its implementation of the employment aspects of the *Education and Employment Strategy* and to support the development and strategic direction of the New Futures Network (NFN) – announced in the strategy – as it is rolled out nationally.

As HMPPS has undertaken its review of Prison Service Instructions (PSIs) to rationalise them into shorter policy frameworks, there has been limited consultation with the voluntary sector. The Incentives and Earned Privilege, Release on Temporary Licence and Libraries and Education policy frameworks for example have all been 'stakeholder' consultations. In practice this has prohibited meaningful engagement with a wide range of voluntary sector partners, as organisations need to be invited to contribute to the consultation. Engaging with voluntary organisations in this way is particularly problematic and effectively prevents organisations from contributing to important policies that will likely have a significant impact not only on their work in prisons but the people they work to support.

Limiting consultations has not only precluded the hugely valuable expertise of the voluntary sector from helping to shape better government policy, but this practice has also often fallen



short of commitments made under section two of *The Compact* – the “commitment to the effective and transparent design and development of policies, programmes and public services”<sup>6</sup> – despite this agreement being renewed in the government’s recent *Civil Society Strategy*.<sup>7</sup>

**CLINKS recommends that the MoJ proactively works to consult with voluntary organisations in the development of policy reform and whilst doing so, adheres to the principles in the compact.**

### **b. Do prison governors and future governors receive sufficient training and support and what more could be done to improve this, particularly in relation to diversity issues?**

As is widely recognised, there is an overrepresentation of people in prison who have characteristics protected under the Equality Act 2010 or experience particular vulnerabilities. It is important that prison staff are able to respond to and meet these unique needs to ensure people receive the support they need on their desistance journey.

Diversity training has however attracted criticism for not adequately reflecting the needs and experiences of vulnerable cohorts and people with characteristics protected under the Equality Act 2010 and for poorly addressing the unequal outcomes they experience in the CJS. Although there have been efforts to review the diversity training provided to prison staff in response to *The Lammy Review* recommendations, the challenges with the training still persist.

CLINKS has repeatedly called for the involvement of specialist voluntary sector organisations in reviewing and delivering diversity training for prison staff at all levels but despite this, HMPPS have not utilised this opportunity and the support the sector could provide. Specialist voluntary sector organisations that have been set up to deliver tailored support to particular cohorts of people have in-depth and valuable knowledge of the diversity of service users, the distinct needs of equalities group and tailoring approaches to meet their needs and improve outcomes.

**CLINKS recommends that HMPPS create opportunities for engagement with specialist voluntary sector organisations in the development and delivery of diversity training for prison staff.**

## **Q2: How should the Ministry of Justice and HM Prisons and Probation Service provide effective oversight of prisons?**

### **b. How is the performance of prisons monitored and should other factors be taken into account? What use is made of data and is there a sufficient focus on outcomes for prisoners across the estate?**

The 2016 White Paper explicitly stated the government’s intention to “set new performance measures for every prison so that governors are clear what they are expected to achieve.” Despite this however, no overall performance framework has been issued



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for prisons. Without this there is a lack of clear expectations as to what governors should achieve which enables inconsistent practice across the prison estate.

**Clinks recommends that this is rectified and key performance indicators are developed, in partnership with prison governors, and with input from other stakeholders including voluntary organisations and people with experience of the prison system, to ensure consistency across the estate.**

The commitment in the *Rough Sleeping Strategy*<sup>8</sup> to introduce a shared 'accommodation on release' metric for prisons and Community Interest Companies (CRCs) was welcome as this has the potential to foster and encourage join up between prisons and probation providers. Since this commitment the MoJ have conducted a review into probation and although we recognise the outcome from this will take time to embed, it is important that this commitment is not lost, and a shared metric between the National Probation Service (NPS) and prisons is developed.

As was outlined by *The Lammy Review*, people from BAME communities are overrepresented at every stage of the CJS. *The Lammy Review* recommended that criminal justice agencies adopt an 'explain or reform' principle whereby if they cannot provide an evidence-based explanation for racial disparities then reforms should be introduced to address those.<sup>9</sup> It is welcome that HMPPS have developed a new equalities monitoring tool, aimed at improving the collection of equalities data, as this should enable the implementation of the 'explain or reform' principle.

Despite this however, there remain challenges with the quality of equalities data that prisons collect. The commonly used, black, Asian and minority ethnic (BAME), is an all-encompassing umbrella term that covers a wide diversity of ethnic backgrounds. In some areas HMPPS still only use five categories for recording ethnicity which does not sufficiently reflect the diversity and distinct experiences of people who fall within the overarching BAME category. For example the unique experiences of people who define as Gypsy, Roma, Traveller are not captured in current monitoring.

In *Tackling Racial Disparity in Criminal Justice System: 2018 update* the MoJ stated that CJS partners are currently drawing up plans to integrate this new standard code into their systems.<sup>10</sup> This is a welcome development as it gives a greater breakdown of BAME categories and a more accurate reflection of equalities issues. However, in developing ethnicity monitoring HMPPS have met challenges in adopting this because there are not always sufficient numbers in each category to provide sufficiently robust data. For prisons, where there are small numbers of people who would define themselves as a certain ethnic group, they are only represented in the wider category such as 'Asian', 'mixed' or 'other'.

**Clinks recommends HMPPS adopt the census categories in its data recording practices to provide a more accurate picture and understanding of the outcomes BAME people experience. Data should be recorded in its most disaggregate form to help improve policy and practices in prison. If this does not produce sufficiently robust data, for publication it can be aggregated into larger categories.**

The latest annual report of the Chief Inspector of Prisons was highly critical of the way prisons monitored the use of force by staff against prisoners. The report outlines that in around two-thirds of the prisons inspected there was an increase in the use of force on prisoners, and significant gaps in the governance of this. In half of the prisons there were concerns about the



quality of documentation to justify the use of force. Video footage and documentation did not always provide evidence that use of force was necessary or proportionate to the risk posed.<sup>11</sup>

**HMPPS have taken important, proactive steps to improving the collection of use of force data, but given the severity of the issues outlined by the Chief Inspector of Prisons, the challenges the data identify need to be addressed without delay.**

Quantitative data only demonstrates part of the picture as it does not allow for a detailed analysis of why a certain trend is taking place, or the impact this has on the people in prison. For example, the current quantitative data HMPPS collects about the number of people from BAME communities who are adjudicated against, does not allow for a more in-depth analysis about the number of non-BAME people who might have committed the same infraction, but not received an adjudication. People with lived experience of the CJS are in a unique position to be able to share their experiences and give a rich account of the story behind the data, which can in turn support the development of policy to address the issues they outline.

**Clinks therefore recommends that HMPPS proactively work to collect and respond to the views of people with lived experience of the CJS to understand the impact of the trends shown through quantitative data on people in prison and to develop policy solutions to them.**

### **d. Is there effective collaboration between prison, probation and other community services and what are the challenges to improving this?**

As has been recently highlighted by the Committee's report on the *Prison Population 2022*,<sup>12</sup> the prison system is currently experiencing many operational challenges. These are not only having an impact on collaboration between these prisons and other parts of the CJS, namely probation services, but it is also making it challenging for people in prison to receive the services they need. Overcrowding, staff shortages and a rise in incidents causing lock downs can mean people in prison are unable to access the vital services they need, including those provided by voluntary organisations. Indeed, the Chief Inspector of Prisons reported that one in five prisoners (20%) said they spent less than two hours out of their cell each day.<sup>13</sup> Our *State of the Sector 2017* research found the conditions in prison were having a particularly detrimental impact on voluntary sector organisations ability to deliver their services. One interviewee told us 'if the wings aren't open, we can't work. If people are locked out, we can't work. If people are suffering from mental health challenges and can't get out of their cells, then we can't work.'<sup>14</sup>

These operational challenges can also make it difficult for both prisoners and staff to know what services are available from the voluntary sector in each establishment. Between September 2016 and October 2017, Clinks ran the Good Prison project which aimed to co-ordinate voluntary sector activity across three prisons. Evaluation of the one-year pilot showed that having a dedicated, single point of contact to coordinate voluntary sector engagement in prisons created more joined up work; improved access to rehabilitative services; and supported more timely and appropriate through the gate provision. This model was found to improve identification of prisoners' needs (including for those with protected characteristics or particular vulnerabilities), what works to meet those needs, and where the gaps in services are contributing to an overall safer prison environment.<sup>15</sup>



**Clinks recommends that every prison should consider adopting the voluntary sector coordination model, either in full or by tailoring the examples of good practice to meet individual prison needs.**

The introduction of through the gate (TTG) provision under the Transforming Rehabilitation reforms was designed to encourage better collaboration between prisons and probation, in offering a full service for people making transitions from custody to the community. However, TTG has received considerable and widespread criticism for being disjointed and the contracts for delivering such services are often described as 'to the gate' rather than 'through the gate' by Clinks members. Individuals in the CJS are falling through the gaps created by the confusion around responsibilities of different agencies and sectors and a lack of communication between them.<sup>16</sup>

Indeed, the most recent HM Inspectorate Probation thematic report into post-release supervision for short-term prisoners found a lack of join up between CRCs, local authorities, substance misuse and mental health services, is preventing people from being able to access the services they need on release. The report outlines, "We found significant difficulties in accessing accommodation, substance misuse and mental health services for this group of offenders. We found CRCs' capacity to influence other key agencies to be weak. Leaders are not routinely included in local commissioning arrangements for accommodation, substance misuse and mental health services."<sup>17</sup> The report also outlines that in too many cases CRCs were working to sustain contact with someone rather than pursuing the interventions or services required to reduce reoffending.

Recognising the challenges with TTG provision, the MoJ has invested an additional £22 million per year to CRCs to support the implementation of an enhanced TTG specification. However in many CRCs this increased investment has not been passed down to the voluntary sector, with CRCs instead choosing to deliver the enhanced specification in house.

The MoJ have also recently published the response to their review of probation and have announced that by 2021 management of all people under probation supervision will be the responsibility of the NPS. It remains unclear exactly what the arrangements will be for providing resettlement services under the new plans. It is essential that as these are developed the vital role that voluntary sector organisations can play in delivering through the gate and resettlement support is recognised.

The proposals offer the potential for greater support for people leaving prison, delivered at an earlier stage in someone's journey to desistance.

**To encourage full cooperation between different services and so that they deliver on that potential, we recommend that there be shared outcome measures between prison and probation services.**

## **e. To what extent are existing arrangements in place for the commissioning of services, such as health and education, fit for purpose? Are there appropriate oversight arrangements in place for these services?**

Clinks supports greater autonomy for governors to commission services from their allocated budgets that meet the specific needs of local populations and many positive changes towards this goal were set out in the government's White Paper, *Prison Safety and Reform*.<sup>19</sup>

However, as set out in our engagement with the Justice Committee's inquiry into prison reform<sup>20</sup> we raised concerns that governors and their teams would need additional support in order to ensure commissioning processes are flexible and transparent enough to allow smaller voluntary organisations which, constitute the bulk of Clinks membership, to participate. We also had concerns on how changes would be communicated to the voluntary sector, and called on government to disseminate timely information to the voluntary sector about changes to budgetary and commissioning responsibilities to ensure the sector are equipped with the information they need to participate.

Feedback from Clinks members has suggested such concerns were justified, most recently in relation to the roll-out of the DPS for prison education. The DPS was set up to give prison governors and heads of learning and skills the autonomy to commission specialist or short-term education services to meet the needs of those in their care. However, there have been a number of significant challenges with the DPS from the point of view of both voluntary sector providers and prisons:

- There are currently relatively short time frames presented for responding to call-outs for services, which coupled with no details of when bids will be responded to by, makes planning very difficult, especially for small organisations.
- Many organisations in the past have been able to present a reasonably low cost for their activity as they can demonstrate match funding from other sources, such as trusts and foundations. The DPS makes this co-funded approach challenging to explain, deliver and plan for with both prisons and funders. It has also brought up issues of fair competition and transparency, as different arts and voluntary organisations take different approaches to costing.
- The DPS is too complex and requires too much resource for it to be valuable to small organisations, especially as contracts are awarded only for one year and for relatively small amounts of money.
- The DPS is based on commissioning for outcomes but it is not clear how much guidance and training is being given to prison staff on how to do this effectively.

**Clinks recommends the MoJ take proactive steps to address the challenges with the DPS to ensure full and proper commissioning of small, specialist voluntary sector services.**

**The MoJ are developing a dynamic framework for resettlement and rehabilitative interventions which will be based on a similar system to the DPS framework. It is imperative that the lessons learnt from the development and implementation of the DPS are reflected in the development of the dynamic framework.**

**Clinks supports the MoJ's intention to develop and run consultation events with partners to inform the development of the dynamic framework. We recommend that this engagement is ongoing to ensure voluntary sector partners can support the MoJ fully in the development of the dynamic framework.**





**CLINKS**

**Clinks supports, represents and advocates for the voluntary sector in criminal justice, enabling it to provide the best possible opportunities for individuals and their families.**

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## End notes

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