

June 2019



CLINKS
RESPONSE

Clinks response to the Ministry of Housing, Communities and Local Government's tackling homelessness together consultation

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 criminal justice system.

Clinks is a member of the Making Every Adult Coalition (MEAM) alongside Homeless Link, Mind and associate member Collective Voice. Together MEAM represents over 1,300 frontline organisations across England. Working together we support local areas across the country to develop effective, coordinated services that directly improve the lives of people facing multiple disadvantage. We use our shared knowledge and practical experience from this work to influence policy at the national and local level.

About this response

Clinks welcomes the opportunity to respond to this consultation. We have focused our response on the questions that are of most relevance to the work of our members.

We held two consultation events with our members to inform our response; one attended by voluntary organisations providing specialist services to women in contact with the criminal justice system and one with organisations with particular expertise in housing and homelessness.



We have also drawn on information garnered from previous and ongoing engagement with our members, namely through the Reducing Reoffending Third Sector Advisory Group (RR3). This is a voluntary sector advisory group to the Ministry of Justice (MoJ) and HM Prison and Probation Service (HMPPS). Clinks provides the chair and secretariat.

RR3 members, and the voluntary sector more widely, have identified that people in contact with the criminal justice system (CJS) experience a range of barriers to securing safe and stable accommodation and are disproportionately likely to experience homelessness. Data from 2017/18 shows that 36% of rough sleepers contacted in London had been in prison at some point.¹ Further, one in seven people who left prison in the year to March 2018 were homeless. This increases to more than one in five people serving a prison sentence of less than six months.²

In response, the RR3 convened a Special Interest Group (SIG) in September 2017, made up of 14 openly recruited experts from the voluntary sector to explore these challenges and make recommendations for how they can be addressed.³

Summary of recommendations

- Key stakeholders including prisons and probation providers should be routinely required to record and publish both the accommodation needs and long term outcomes of people in contact with the CJS.
- Opportunities for early intervention and prevention are capitalised on; every time someone has contact with criminal justice agencies their accommodation needs should be identified and addressed. Local referral arrangements should be developed to support this and ensure people can access the services they need.
- NHS England encourage consistency of approach for all liaison and diversion services in terms of their assessment of accommodation issues and development of referral pathways with housing providers
- The Ministry of Justice, in partnership with Welsh Government, ensures local organisations are frequently informed and updated about their role and responsibility in relation to meeting the accommodation needs of people in contact with the CJS in England and Wales.
- To support the desistance process, resettlement planning needs to take place in partnership with the person in prison and begin as soon as they enter custody.
- To ensure the relevant oversight both nationally and locally we reiterate the RR3 SIG's overarching recommendation, that the Ministry of Justice develop and leads a cross-departmental accommodation strategy.
- If homelessness reduction boards are created they should follow the set or core principles we outline in our response including having both a strategic and operational approach; are held to account through national oversight; has representation from experts by experience; ensures all members are treated as equal partners; facilitates join up with criminal justice partners; compliments the work of existing multi-agency structures; promotes, recognises and facilitates good practice; prioritises and is responsive to the needs of people with protected characteristics; is evidence based and works to shared goals and outcomes measures; have clear accountability structures and is transparent and under regular review.
- Key stakeholders, including prisons and probation providers, should be routinely required to record and publish both the accommodation needs and long term outcomes of people in contact with the CJS.



- To ensure consistent data is collected, we reiterate our recommendation that the MoJ and Ministry of Housing, Communities and Local Government (MHCLG) provide clear definitions of key terms including homelessness and appropriate accommodation, outline when and how these terms should be used and determine key indicators for success.

Q1: What non-statutory structures are you aware of in your area that cover homelessness as part of their agenda?

For each of these please indicate which of the following could be considered one of their objectives:

- a. Developing a strategic vision for tackling homelessness in the area;
- b. Agreeing actions that each delivery partner will take forward to help reduce homelessness;
- c. Co-ordinating use of funding and resources to reduce homelessness;
- d. Evaluating the effectiveness of homelessness services and interventions;
- e. Monitoring progress towards the delivery of the local homelessness strategy;
- f. Holding the local housing authority to account for the outcomes they achieve with people who are at risk of homelessness or are homeless, using key data and evidence;
- g. Holding delivery partners to account for the outcomes they achieve with people who are at risk of homelessness or are homeless, using key data and evidence;
- h. Discussion of how to manage individual cases;
- i. Support for specific vulnerable groups, for example offenders; and
- j. Other, please specify.

Q2: How effective are the non-statutory structures in your area in meeting their stated objectives?

Question 3: More generally, what are your views on whether these sorts of non-statutory structures can drive system change, support the reduction of homelessness in the local area and hold all local partners to account for delivering their commitments?

As highlighted in the consultation, there is wide variation across the country in relation to the local non-statutory structures that work to drive systems change and support the reduction of homelessness. Voluntary organisations by their very nature are flexible, person centred and responsive to change as they are not confined by operating within different policy silos. As such, they are often able to join up different parts of the system and work to drive systems change.



Voluntary organisations working with people in contact with the criminal justice system have led a variety of initiatives to involve people with lived experience in their work, as well as informing policy. Indeed, Clinks' state of the sector research shows that 69% organisations say they consult service users about the design and delivery of their services whilst 38% say they have a service user forum, group, panel and/or council. Voluntary organisations who work in this way are attune to the needs of the people they work to support, and are able to foster their trust and engagement.

One example is the Making Every Adult Matter Coalition which supports local partnerships across England to develop a coordinated approach to tackling multiple disadvantage in their local area. It focuses on creating long-term, sustainable change to the way that complex problems and systems are approached and understood.

The MEAM Approach is a 'non prescriptive' framework, which is updated periodically based on learning and experiences from across the MEAM Approach network. While every local area considers actions under each of the seven elements, the specifics of what they choose to do will depend on local circumstances. It is currently being used by partnerships of statutory and voluntary agencies in 27 local areas across England.

To date, MEAM Approach areas have secured £1.3m of local funding to support their work. MEAM Approach areas that conducted evaluations report an average 23% reduction in wider service use costs and a 44% improvement in wellbeing.⁴

Q4: Which statutory structures and individuals with statutory roles in your local area currently have strategic and operational conversations about how individual services and interventions can help reduce homelessness?

During our consultation events, organisations gave specific examples of statutory organisations that are taking a leading role in working to reduce homelessness locally.

Greater Manchester Homelessness Action Network

The Greater Manchester Homelessness Action Network, established by Andy Burnham, the Mayor of Greater Manchester, includes representatives from both statutory and voluntary organisations who have co-produced a strategy and implementation plan to work to end rough sleeping by 2020. The implementation plan has a specific reference to the criminal justice system, highlighting the need to ensure 'leaving the care or duty of public sector agencies such as hospital, prison and the care system, ceases to be a reason for individuals to become street homeless.'

Although voluntary organisations welcomed this approach, they highlighted the strategy does not focus on issues impacting the whole of Greater Manchester, despite including representation from 10 Local Authorities.



Leeds City Council

Leeds City Council launched their Housing Strategy 2016-2021 which includes a commitment to build in-reach services with hospitals/prisons to ensure no one is discharged to the street. The new strategy is welcome and was developed in close consultation and participation with voluntary organisations, including those represented through the Leeds Crime Reduction Network.

Multi-Agency Public Protection Arrangements (MAPPA) in London

MAPPA arrangements in London are led by the Met Policy and have representation from statutory partners including local authorities, as well as voluntary organisations. The arrangements are set up for people who have offended and are deemed to be high risk and often do not have a local connection. In some cases this is because they are British people who have sent back to the UK to serve their sentence after committing an offence abroad, but have not lived in the country for a significant period of time.

Through the MAPPA arrangements the different Boroughs share between them their duty to house someone. Organisations at our consultation event outlined that in some cases this works well, but there is variation in the commitment of different local authorities, with some being difficult to engage. This is challenging as there is no mechanism through which to hold local authorities to account, and although organisations can use the MAPPA board to try and prioritise certain cases, this can be resource intensive for the voluntary organisations involved.

Q6: Please describe how you think the statutory structures and individuals with statutory roles in your area should be discussing and contributing to plans and actions to reduce homelessness i.e. what should they be doing?

Meeting the accommodation needs of people who have offended is the responsibility of agencies that operate both within and outside of the criminal justice system. The introduction of the Homeless Reduction Act (2017), which specifically names probation providers and prisons as public bodies subject to the duty to refer, and the investment of £3.2 million in accommodation pilots as announced in the Rough Sleeping Strategy facilitate are welcome steps in ensuring organisations work collaboratively to prioritise and work to identify accommodation issues experienced by people in contact with the CJS.

The RR3 SIG paper gave a series of recommendations that if implemented could help ensure statutory partners locally are contributing to the reduction of homelessness for people in contact with the CJS:

Key stakeholders, including prisons and probation providers, should be routinely required to record and publish both the accommodation needs and long term outcomes of people in contact with the CJS.

Opportunities for early intervention and prevention are capitalised on; every time someone has contact with criminal justice agencies their accommodation needs should be identified and addressed. Local referral arrangements should be developed to support this and ensure people can access the services they need.

NHS England encourage consistency of approach for all liaison and diversion services in terms of their assessment of accommodation issues and development of referral pathways with housing providers.

The Ministry of Justice, in partnership with Welsh Government, ensures local organisations are frequently informed and updated about their role and responsibility in relation to meeting the accommodation needs of people in contact with the CJS in England and Wales.

To support the desistance process, resettlement planning needs to take place in partnership with the person in prison and begin as soon as they enter custody.

To ensure the relevant oversight both nationally and locally we reiterate the RR3 SIG's overarching recommendation, that the Ministry of Justice develop and leads a cross-departmental accommodation strategy.

Q10: What are your views on the merits and drawbacks of establishing Homelessness Reduction Boards, and whether we should establish them?

During our consultation events, organisations highlighted the potential positive and negative implications that could result from the establishment of Homelessness Reduction Boards. It is important to note that these are dependent on how Homelessness Reduction Boards are structured – please see page 7 for further information. We have provided a synthesis of these as follows:

Potential merits of establishing Homelessness Reduction Boards

1. Reduction of siloed working and the creation of a whole systems approach

The RR3 Special Interest Group demonstrated that there is often the lack of coordination and join up needed both locally and nationally to ensure the accommodation needs of people in contact with the CJS are met.

Homelessness Reduction Boards (HRBs) could have a key role to play in reducing siloed working and could bring together and open up communication between all the relevant statutory and voluntary local partners including those working in the criminal justice system.

As highlighted earlier and recognised by the consultation, there are different arrangements and structures in each locality that work to address homelessness. HRBs could have a key role to play in ensuring coordination and joint working between the existing multi-agency boards, as well as operational services. It is essential that this coordination is replicated nationally and there is coordination between all local Homelessness Reduction Boards.



2. Ensure a holistic approach to someone's needs

If someone has an accommodation need they are likely to have other additional needs, which can include, but are not limited to, experiencing poor mental health, problematic drug and alcohol misuse and contact with the criminal justice system. When assessing accommodation needs it is therefore important that people's wider needs should be taken into account as well as giving people as much autonomy as possible in any decision making processes.

As well as having a strategic role, Homelessness Reduction Boards could function to provide coordination between organisations providing operational services, encouraging a holistic approach to meet someone's needs.

3. Be informed by people's lived experience

People in contact with the criminal justice system have experienced accommodation challenges and are experts by experience in terms of what was or was not effective in supporting them into secure, safe and appropriate accommodation. Homelessness Reduction Boards could provide a good opportunity for the views and experiences of people with lived experience to be represented at both a strategic and operational level locally and to be involved in key decision making processes.

4. Ensure accountability

If Homelessness Reduction Boards are created it is essential that they have multi-agency representation. Delegates at our consultation events outlined that this could enable them to provide 'a focal point' for holding relevant agencies and services to account. These will include both those in the voluntary and statutory sector. The creation of shared outcome measures is essential to supporting this process and will need to be developed in partnership with voluntary organisations and the people they work to support.

5. Facilitate positive engagement with the voluntary sector

We were told that voluntary organisations often experienced a power imbalance when represented on strategic boards and did not feel they were treated as equal partners by statutory organisations. Delegates outlined that the boards could be an opportunity to create true and equal partnership between voluntary and statutory sector organisations and enable them to work to achieve shared outcomes.

Potential challenges of establishing Homelessness Reduction Boards

1. Inconsistency across the country

Each locality across England has different structures and accountability measures to address homelessness. If Homelessness Reduction Boards are created in some areas but not others this could exacerbate local variation, making it challenging to have a consistent and uniform approach across the country. Delegates at our events were concerned that this could create a postcode lottery for provision, especially between district and county councils. If the boards are not mandatory, or if memberships from certain agencies not mandated, organisations questioned the motivation each locality will have for creating them highlighting that this could lead to further inconsistency.

2. Challenges with location

Organisations questioned the geographical footprint that Homelessness Reduction Boards would operate within, highlighting that organisations who would need to be members of the boards currently work across different geographical areas that are not coterminous. This creates challenges for involving all the relevant partners across each locality, especially across different sectors. Organisations at our events gave the example that local authority areas do not match across to Police and Crime Commissioners areas. This is likely to be further exacerbated by the current proposals for the creation of 10 contract package areas for the delivery of probation services under the Ministry of Justice's current Probation Review.

The consultation suggests that Homelessness Reduction Boards could be created in areas where there are high rates of homelessness. This is challenging to determine however, due to lack of consistent collection of data by criminal justice agencies, and as delegates at our event highlighted, official statistics can mask some people's experiences of homelessness. People who are 'sofa surfing' for example or in unstable accommodation are often not represented in official statistics rendering them 'hidden homeless.' Further, as official data represents aggregate levels of need, it fails to reflect if there are people with very high levels of need including those experiencing multiple disadvantage who would particularly benefit from the coordination of services that Homelessness Reduction Boards could bring.

3. Duplication

As recognised by MHCLG, "the local delivery landscape is complex, with a number of agencies and bodies with different priorities and funding constraints operating under a variety of accountability arrangements. Complexity has increased over the years as different layers of accountability arrangements have been introduced to tackle different problems." There is a risk that the creation of Homelessness Reduction Boards will add to this complexity and will duplicate the work of existing structures.

4. Preventing flexibility

During our consultation events, organisations raised the tension between the operation delivery of person-centred approaches to provide people with the holistic support they need to address their accommodation needs and strategic boards that can be inflexible. If Homelessness Reduction Boards are too bureaucratic this could create challenges for the provision of services and support to meet people's needs.

If we were to establish Homelessness Reduction Boards:

Q11: What do you think their purpose and objectives should be?

Q13: Who should be members of Homelessness Reduction Boards?

Q14: What is needed to make Homelessness Reduction Boards effective (e.g. guidance, legislation, incentives etc)?

In their respective responses, Crisis and St Mungo's both support the introduction of Homelessness Reduction Boards. Further, our partners Homeless Link also highlight that many of their members would also support their introduction.

If Homelessness Reduction Boards are created they need to follow a set of core principles to ensure they can be effective. We have outlined these below:

1. Has both a strategic and operational approach

Homelessness Reduction Boards will need to fulfil two purposes – setting the strategy to address homelessness and implement systems change and having an operational, delivery, case management approach. Any board will need to be two-tiered, with the work of each part of the board influencing and driving the other. This mirrors the MEAM Approach, where local agencies will have an operational and strategic board (please see page 3 for more information).

A key part of any operational focus will be to map existing provision and services to enable Homelessness Reduction Boards to determine what is already in place in their locality, where any gaps are in provision and if there are any areas of duplication. Mapping will need to include all organisations that have duties in relation to reducing homelessness, including those working in the criminal justice system, namely prisons and probation providers.

2. Is held to account through national oversight

The structure, membership, aims and objectives of Homelessness Reduction Boards will be different in each local area. To encourage consistency of approach, where possible, and to ensure the boards are held to account there needs to be national oversight. MHCLG needs to have overall responsibility for creating a national oversight structure. As part of this, it should be made clear which organisation or organisations 'own' Homelessness Reduction Boards in each locality and are ultimately responsible for their outcomes.

3. Has representation from experts by experience

People who have been in contact with the justice system and have experienced accommodation issues are experts by experience and will be able to provide Homelessness Reduction Boards with invaluable guidance and advice about how to ensure positive accommodation outcomes for people are achieved. Involving people in this work can empower and support them further on their desistance journey. Experts by experience need to be represented both strategically and operationally.

4. Ensures all members are treated as equal partners

In our consultation events voluntary organisations highlighted that there can be an unequal power dynamic on the strategic and operational boards they are represented on, to their disadvantage. Voluntary organisations have a wealth of knowledge and experience and have been providing essential services to people in contact with the CJS for over 300 years. This pool of expertise needs to be tapped, making it essential that voluntary organisations, alongside the people they support, are represented on homelessness reduction boards and that they are seen and treated as equal partners with their statutory counterparts. As many voluntary organisations are small and community based, Homelessness Reduction Boards should consider providing resource to ensure they are able to attend meetings, alongside the people they support.

5. Facilitates join up with criminal justice partners

As previously outlined, people in contact with the criminal justice system are disproportionately likely to experience accommodation challenges. To prevent siloed working and maximise the likelihood of meeting these accommodation needs, criminal justice partners, including prisons and probation providers (who are explicitly named as public bodies subject to the duty to refer under the Homelessness Reduction Act 2017) as well as voluntary sector organisations should be represented on Homelessness Reduction Boards. Given the multiple disadvantage people experiencing homelessness and having contact with the criminal justice system experience, they are also likely to experience health inequalities and it is therefore important that Homelessness Reduction Boards have representation from health partners.

6. Compliments the work of existing multi-agency structures

As recognised by MHCLG multi-agency responses to reducing homelessness already exist, including but not limited to Health and Wellbeing Boards, Multi Agency Public Protection Arrangements, community safety partnerships and local reducing reoffending boards. To avoid duplication of work it is essential that Homeless Reduction Boards are informed by, and compliment the work of, these existing arrangements.

7. Promotes, recognises and facilitates good practice

As was demonstrated by the RR3 SIG, there is a range of successful and innovative projects led by voluntary organisations that achieve positive accommodation outcomes for people. It is important that Homelessness Reduction Boards recognise, facilitate and build upon this good practice.

8. Prioritises and is responsive to the needs of people with protected characteristics

Many people in contact with the CJS are from equalities groups, have protected characteristics or experience multiple disadvantage, meaning they often require specialist support and services to ensure their specific needs can be met. Many voluntary organisations provide these tailored services to their clients and organisations who took part in our consultation events highlighted that unless the needs of people requiring specialist support are proactively prioritised they often go unaddressed. Homelessness Reduction Boards should therefore clearly articulate how they will ensure the needs of people requiring specialist support will be met.

9. Is evidence based and works to shared goals and outcomes measures

As highlighted by the RR3 SIG, there is currently a lack of consistent, transparent data about the accommodation needs and outcomes for people in contact with the CJS. Indeed, as the Public Accounts Committee recently outlined,⁵ after the implementation of the transforming rehabilitation reforms, 'prisons have been releasing prisoners without settled accommodation, with some prisoners having been provided with tents instead. The Ministry does not know how many prisoners have settled accommodation after they leave prison.' Homelessness Reduction Boards could have an important role to play in helping address this issue, as well as collating and sharing homelessness data locally. This data needs to inform shared outcome measures, and indicators of success that all representatives on Homelessness Reduction Boards need to work towards. As was highlighted during our consultation events, any outcome measures need to be long-term to provide a longitudinal analysis of people's accommodation outcomes.

10. Has clear accountability structures

For Homelessness Reduction Boards to be successful they need to create mechanisms to hold local partners to account for their progress in achieving shared goals and outcome measures. Organisations represented at our consultation events explicitly told us that local councils should be held accountable to the Homelessness Reduction Boards, especially in relation to progress with their local homelessness strategy.

11. Is transparent and under regular review

Homelessness Reduction Boards, if created, will be a new local structure. MHCLG should review their structure, development and progress annually to ensure they are meeting their aims and having an impact on levels of homelessness.

If homelessness reduction boards are created they should follow the set or core principles we outline in our response including having both a strategic and operational approach; are held to account through national oversight; has representation from experts by experience; ensures all members are treated as equal partners; facilitates join up with criminal justice partners; compliments the work of existing multi-agency structures; promotes, recognises and facilitates good practice; prioritises and is responsive to the needs of people with protected characteristics; is evidence based and works to shared goals and outcomes measures; have clear accountability structures and is transparent and under regular review.

Q19: What do you think we should consider and include in the design of the data pilots?

It is essential that that data pilots include a focus on the criminal justice system. However, as the RR3 SIG demonstrates, there is no reliable data collected about accommodation outcomes for people serving a community penalty and on release from prison. The data pilots, in their aim to "explore what data exists, the definitions and standards of data, and to develop and test an outcomes framework" have a key role to play in highlighting and addressing this issue. We therefore reiterate the following:

The SIG recommends this is swiftly addressed, with key stakeholders including prisons and probation providers being routinely required to record and publish both the accommodation needs and long term outcomes of people in contact with the CJS.

This needs to move beyond just accommodation outcomes immediately on release and include longitudinal outcomes. This data should be matched with data collected by other local and national stakeholders, such as that collected through joint strategic needs assessments conducted by clinical commissioning groups and supported housing strategic plans for example.

Improving the collection and transparency of data will help with the identification of both good and poor practice as well as gaps in provision, which can lead to service improvements. It is essential that any data collected is used to inform the development and delivery of current and future services.

To ensure consistent data is collected, we reiterate our recommendation that the MoJ and MHCLG provide clear definitions of key terms including homelessness and appropriate accommodation, outline when and how these terms should be used and determine key indicators for success.

Q21: What else could the Government be doing to support partnership working across local delivery partners in an area to systemically reduce homelessness?

National government has a key role to play in facilitating and supporting organisations that work locally to address homelessness. To support this, we reiterate our recommendation that the Ministry of Justice develop and leads a cross-departmental accommodation strategy. As outlined by the RR3 SIG, one of the key principles of any accommodation strategy needs to promote, recognise and facilitate good practice at both a local and national level.



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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Q22: Do you think that any of the issues discussed in this consultation could or already do have a disproportionate impact, positive or negative, on any individuals, in particular those with 'relevant protected characteristics' (i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation)?

Please provide evidence to support your response.

Q23: How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity? Please provide evidence to support your response.

We support MHCLG's focus and prioritisation of the needs of people protected under the Equality Act (2010). We have identified particular areas throughout our response where the department should be alive to the potential impact the creation of Homelessness Reduction Boards could have on whether the needs of these groups, as well as those experiencing multiple disadvantage, will be met. As one of the core principles we identify in relation to creating Homelessness Reduction Boards, it is imperative that they prioritise and are responsive to the needs of people with protected characteristics.

End notes

1. Greater London Authority (2018) *CHAIN annual report: Greater London, April 2017 – March 2018*. Online: <https://data.london.gov.uk/dataset/chain-reports> (last accessed 03.05.2019)
2. Ministry of Justice (2018) *Freedom of Information request 180915001 by Vicki Cardwell*. Available at: www.whatdotheyknow.com/request/homelessness_on_release_from_pri#incoming-1240602 (last accessed 03.05.2019)
3. RR3 (2017) *RR3 Briefing: meeting the accommodation needs of people in contact with the criminal justice system*. Online: www.clinks.org/publication/rr3-briefing-meeting-accommodation-needs-people-contact-criminal-justice-system (last accessed 10.05.2019)
4. Making Every Adult Matter (2019) *The MEAM Approach*. Online: www.meam.org.uk/the-meam-approach/ (last accessed 03.05.2019)
5. Public Accounts Committee (2019) *Transforming Rehabilitation: progress review*. Online: www.parliament.uk/business/committees/committees-a-z/commons-select/public-accounts-committee/news-parliament-2017/transforming-rehabilitation-progress-review-report-published-17-19/ (last accessed 03.05.2019)