

## Feedback and questions about the draft specification for Residential Women's Centres

On behalf of the Ministry of Justice (MoJ), Clinks held an event to update the voluntary sector working in criminal justice about plans for the Residential Women's Centre (RWC) pilots announced in the Female Offender Strategy.

The event was attended by over 100 delegates. MoJ presented the draft specification for the RWCs and consulted on the following four key areas:

- Integrating the RWCs with other local services
- Ensuring a trauma-informed environment
- Supporting transition from residing at the RWC to settled, independent accommodation
- Meeting the diverse needs of women.

Below is summary of their feedback which we hope will be used to inform further development of the RWCs.

The event also provided an opportunity for delegates to ask officials further questions about the RWC and specification presented. Officials who attended the event answered as many as possible. However, due to the number of delegates and volume of questions it was not possible to respond to them all during the time available. Therefore, Clinks has collated the questions from delegates which can be found in Annex A. Clinks will work with the department to reflect their responses back to the voluntary sector.

### Overall feedback

Delegates had some overarching reflections and concerns about the purpose of the RWCs which we have summarised here:

- **Concern continues to be raised about who the RWCs are aimed at supporting, their purpose and the issues they are trying to address.** Although the MoJ has specified that the RWCs are aimed at women who are at risk of short custodial sentences, delegates felt that residing at the RWCs for three months could replicate the disruption caused by short-term imprisonment which would be counterproductive. Delegates outlined that women in this position should be supported to remain in their community, particularly if they already have a settled home rather than providing an alternative institution for them to be held in. It is also unclear how broad 'local' is being defined or approached in the model, with organisations concerned that women could be made to reside long distances from their homes. This will also impact how far they have to travel to engage with the support hub once no longer residing at the RWC and the continued disruption and cost to women.
- **There also continues to be concern about the role of consent and choice in the model.** Women must agree to reside at an RWC but with custody as the alternative, the sector questioned the impact this has on how meaningful their consent can be. The impact of consent and choice continued to affect how the sector felt about the role of the RWC and

the impact of compliance and enforcement particularly if women face continued threat of imprisonment for non-compliance.

- **The sector continues to voice concern about a model where the residential site is based at the same site as the support hub particularly for the risk it poses to the safety of women who have experienced domestic abuse.** If the support hub is public facing support, this could mean a woman's abuser can locate where she lives. Safeguarding women residing at the RWC from their abuser must be a paramount consideration underpinning the design of the model and for this reason delegates recommend the residential element be based at a separate site to the support hub.
- **It is unclear how engagement between the RWC pilots and the probation reform programme will work.** In particular, there was concern about commissioning services via the Dynamic Framework (DF). The complexity of the DF's competition process and issues with the contract values and volumes has limited voluntary sector engagement particularly from smaller providers and Welsh-specific providers. For example, there are no Welsh providers of accommodation bidding. Added to this are concerns about transition issues as it takes time for the new system to embed.
- **Delegates also reflected that it was challenging to provide feedback without further information on the financial envelope available for the RWC pilots.** A clearer understanding of the funding available would enable delegates to have a clearer sense of what is feasible for the RWCs, for example in the design of a trauma-informed building and the provision of services.

## Integrating with local services

<p><b>Question:</b> The RWC needs to integrate with other local services. What will help ensure its successful integration?</p>
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Delegates discussed the importance of co-ordinating with existing services and not duplicating existing provision provided by the voluntary sector. Whilst delegates recognise that there is not currently a women's centre in South Wales where the first RWC will be located, there continues to be concern that it could duplicate or foster competition with other gender-specific services being provided by voluntary sector organisations specialising in supporting women.

There is also a question about whether the further four RWC pilots could duplicate provision provided by existing women's centres if there is one in the area chosen. If this is the case, the RWC will need to work closely with the women's centre to ensure co-ordination and join up. Preference was expressed by some for exploring how existing women's centres may be commissioned to develop a residential component to their services for those in the community in need of that support rather than implementing new RWCs in those areas. Anawim and Dawn House provide good practice examples of this model.

Building relationships with community services that have local expertise is vital to ensuring the RWC can respond to local needs and that there is clear communication with partners, smooth referrals, and strategic join up. Concern was raised that current experiences of challenging communication with statutory services could be replicated with the RWCs.

## Mapping

Delegates felt it was important for there to be regular mapping exercises in order to understand what existing services there are in the surrounding area and enable the RWC to create a menu of services for women to choose from and engage with.

- **Understanding and building capacity** As part of this scoping exercise, it is important to consider what the capacity of services is to support the RWCs and the women who will be accessing it. Delegates were clear that it is important not to assume that services would have capacity to support women at the RWC without additional funding and capacity building.
- **Regular reviews** Any mapping exercise should also be regularly reviewed to reflect the changing environment so that RWC staff can stay up-to-date on new projects and services that the voluntary sector could provide to service users.
- **Engaging potential partners** It was suggested that there should be events for those interested in tendering for the RWC so that they can start to meet local service providers and build partnerships.

## Strategic alignment, relationship building and communication

Following mapping, delegates raised the importance of beginning early conversations with local authorities, housing associations, and other key stakeholders including voluntary sector providers and sustaining those conversations as the RWCs continue to be developed and refined. This is important to ensure buy-in with the RWC and that partners have shared understanding of outcomes and goals and work collectively towards them.

Areas that have implemented Whole Systems Approaches such as Greater Manchester and South Wales (the location for the first RWC) provide opportunities for learning and embedding best practice in coordinating services and working towards shared outcomes for women in contact with the criminal justice system. It was suggested that implementation of the RWC could be embedded in a wider process of implementing a whole systems approach in areas where this does not exist.

- **A full and equal partnership with the voluntary sector** Delegates raised some examples where communication and information sharing from prisons, probation services and other statutory services with the voluntary sector has been challenging which has created barriers for them in coordinating support for service users.<sup>1</sup> The RWC should embed a principle of full and equal partnership with the women's voluntary sector, engaging organisations both in strategy and design as well as delivery. To support this aim, MoJ should seek to learn from good practice examples and embed the principles of the government's compact agreement<sup>2</sup>. It should be clear the responsibility is not just with voluntary sector providers to communicate with the RWC and other stakeholders about the support women are receiving.
- **Shared goal and focus on women** To ensure successful integration of the RWC with local services, local partners must have a shared, agreed upon goal to support women in contact with the criminal justice system and for them to be recognised as a priority group.

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<sup>1</sup> For further examples of concern about communication and engagement with the voluntary sector, please see the following paper from the Reducing Reoffending Third Sector Advisory Group's (RR3) special interest group on Covid-19, available [here](#).

<sup>2</sup> HM Government (2010) *The Compact*. Available [here](#) [accessed 10 October 2020].

- **Strategic and policy alignment** To ensure strategic and policy alignment as well as operational join-up, the RWC should engage with the structures, strategic groups and boards that are already in place in the area such as the Criminal Justice in Wales Board. In Wales specifically more information is needed on how the South Wales RWC will link in with the existing women's pathfinder.
- **Information sharing and referral processes** At an operational level, it is important to have mechanisms in place that ensure join-up between a variety of services. This includes having agreed processes for referrals, handover and information sharing set up.
- **Multi-agency meetings** Multi-agency meetings were suggested for case work, like the model of case conferences used by the Women's Pathfinder Group in South Wales. This would bring together relevant agencies and services, including the voluntary sector and would help to improve joint working, information flow, and collaborative problem solving.
- **Engaging a range of services** The Support Hub could be used to provide regular drop-in sessions for local services to highlight their services to women accessing the RWC. This is based on a model implemented by one of the organisations at the event where solicitors come into their service one day a week to talk about the support they provide. The Clinks *good prison* project provides another example of voluntary sector service co-ordination.<sup>3</sup>

## Funding

Delegates had a number of concerns about how current funding challenges and procurement processes could impact the ability of local voluntary sector organisations – particularly those that are small and specialist - to engage with, and support, the RWCs with particular concern noted about relying on the probation dynamic framework.

- **Unsustainable funding for local services** It is important that the RWC is to engage with local services that are embedded in the community and organisations that specialise in providing tailored services to particular cohorts such as women and black, Asian and minority ethnic (BAME) communities. However, it must also recognise that as small organisations they often have little funding to cover core costs and their sustainability is often at risk. As such it could be challenging for them to provide additional support without receiving additional funding.
- **Probation dynamic framework** Qualifying for and competing for contracts via the dynamic framework for the new probation model has been a complex and challenging process for the voluntary sector to engage in. Delegates are therefore concerned that relying on the dynamic framework as the primary mechanism for procuring support services will limit voluntary sector engagement especially smaller organisations.
  - **Welsh organisations** There are currently no Welsh organisations bidding to provide accommodation services via the dynamic framework. This poses significant concern as it is important to have Welsh-specific providers available to support women accessing the RWC in Wales.
  - **Alternative procurement mechanisms** Delegates questioned if there would be an alternative mechanism in place to enable procurement of services outside of the dynamic framework and if so, what that would be. They highlighted the importance of this process being accessible to small and specialist organisations including enabling greater use of grants.

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<sup>3</sup> For more information on the co-ordination model tested in the *good prison* project, please see [here](#).

- **Co-commissioning** It was suggested that services could be co-commissioned opportunities at a local level involving partners such as police and crime commissioners, local authorities and health services.

## Ensuring the RWCs are trauma-informed

**Question:** What do you see as the key components for a trauma informed social and physical environment at the RWC? Why is this?

At the core of trauma-informed practice there needs to be deep empathy, a culture of non-judgement and a person-centred approach. Delegates discussed how trauma can manifest in lots of ways both physically and mentally, with feedback highlighting that even being put in an RWC as a required environment is a kind of trauma and will be triggering for some women. Delegates questioned therefore the extent to which the RWC, by its very nature being enforced, could enable a fully trauma-informed environment and trusting relationships. Their concerns are highlighted below.

- **Punitive culture** A culture and environment centred around punishment and discipline is counter-productive to creating a trauma-informed environment and supporting women on their desistance journeys. The RWC should work instead to promote a culture of understanding, support and learning. One that prevents feelings of failure and recognises that it is expected for women to hit some bumps as they progress in their desistance journeys. Relevant training on desistance is needed for staff to ensure they embed this in their practice.
- **Enforcement and discipline** Prison would be a huge set-back and highly disruptive for women and delegates stressed the importance of having a proportionate response to compliance. Importantly, trauma-informed services need to be led by the women themselves. Therefore, it is important that any decisions around breaches and the actions taken as a result should involve active discussions with the women so that they feel heard and empowered.
- **Building trust** Organisations raised concern about the impact of enforcement and compliance on relationships between the women and voluntary sector organisations engaged with the RWC. Voluntary organisations are often in a better position to engage people and build trust with service users than statutory organisations. There need to be distinct, clearly set out roles and responsibilities for probation, RWC staff and voluntary sector providers that are transparent and communicated effectively both for staff and for the women at the RWC.
- **Choice and empowerment** For women who have experienced trauma, they must be able to engage with interventions that address their trauma when they are ready. Empowerment and choice is crucial. Forcing someone to address trauma and potentially facing enforcement action for not doing so undermines the intervention and progress that could be made.

With these fundamental challenges in mind, delegates have outlined key areas to consider in more depth to promote a suitable environment for the women and necessary steps for anywhere to embed trauma-informed principles.

- **Shared standards and accountability** It was suggested that there be standards set for trauma-informed working. This will enable staff to have a shared understanding of what it means to work in a trauma-informed way and have clear guidelines and principles to follow

and embed in their work. This would also enable MoJ and HMPPS to create an effective process for assessing the delivery of the RWC against those standards.

- **Training** Staff need appropriate, specialist training on trauma-informed working that reflects the principles set out for the RWC (see above). This training needs to be ongoing with regular top-ups and there must be space for staff to reflect on practice, discuss challenges with embedding the trauma-informed principles, and highlight areas for change and development. Clinks recommends engaging with voluntary sector organisations that are set up to provide tailored support for women and who have trauma-informed practice embedded into the heart of their services.
- **Consistent point of contact** Regular changes in staff are disruptive to progress and engagement with services. There should be a consistent point of contact or key worker assigned to women for their entire journey with the RWC so that they can build a trusting relationship with them. This will allow a relational approach which is key for a trauma-informed holistic model and will help to mitigate against issues created by having multiple agencies and staff involved in someone's case which can be overwhelming for the women involved.
- **Peer support** Peer support from others with lived experience of contact with the criminal justice system is highly important for creating an understanding and trusting environment.
- **Disclosure** Further discussion is needed on balancing data-sharing to avoid unnecessary disclosure and consent for personal information to be shared. Whilst it is important to have as full a knowledge as possible of an individual's needs and trauma, an individual repeatedly disclosing their experiences can be re-traumatising. Consideration needs to be given to how this can be mitigated, including for those that will be encouraged to disclose information as part of their eligibility assessment but not go on to reside at the RWC.
- **Physical space** The design of the RWC's physical space will be crucial to promoting a trauma-informed environment and must be a core part of the procurement decisions for a building. It is vital that the space does not feel institutional or like a prison. The site should provide a homely, welcoming and aesthetically pleasing space with residents able to personalise their space. The reception area should particularly be made to be as welcoming and light as possible. Barriers, locked doors and compliance or rule-focused language (both that used verbally by staff and written communication such as signs) do not support a trauma-informed environment.
- **Good practice example** The 'democratic therapeutic community' model at HMP Send was cited as an example of good practice that the department should explore learning from to inform the RWC.

## Supporting transition from residing at the RWC into settled accommodation

**Question:** What needs to happen for a woman to transition successfully from the RWC to her settled accommodation at the move on stage?

The groups discussed the challenges of providing meaningful interventions to support women for the transition back into independent living and the tight timescales for ensuring relevant practical measures are in place. Delegates highlighted the importance of beginning planning for move-on at the earliest possible moment and having strong processes in place to ensure services are in place.



The biggest concern for organisations was the practicalities of ensuring that safe, suitable and settled accommodation is ready for women particularly given the lack of accommodation currently available.

## Balancing length of stay with women's needs

There were concerns about women getting intense support for 12 weeks and then an immediate step down in the level of support provided after that. It was felt the focus for the duration of their stay will always have to be on moving on due to the short timeframe and therefore women will not be able to experience feeling settled and secure. Some delegates felt there should be flexibility in the time spent residing at the RWC, to ensure the necessary support was in place for their transition back into the community.

However, if this is to be the case, there is a clear need to balance any flexibility in the length of residence at the RWC with the proportionality of the women's sentence and their offence. Any decision regarding changes in the length of residence must be led by the women themselves with their consent and have clear transparency and scrutiny measures in place to monitor changes in length of stay.

- **Staggered and flexible support** There should be a staggered approach to the level of support that women received at the RWC dropping down in intensity.
- **Planning for the transition** Preparation for moving on must start early when a woman first moves in. Women residing at the RWC should be actively engaged in developing their sentence plan with a keyworker and setting their goals including plans for resettlement and what services might be needed post-residence. The plan, and the progress made, should be regularly reviewed with their key worker and women fully informed of any changes, developments or delays. It is important for women where possible to have contact with services needed post-residence before moving on from the RWC. This will increase the likelihood of continued engagement.

## Preparing for life after the RWC and continued support

The group also highlighted key principles and factors for successful move-on from residing at the RWC and suggestions for ensuring women have the resources and skills needed to support them on their desistance journeys while living independently.

- **Location and safety** The location of move-on accommodation will be paramount for successful transition with a range of factors to be considered, including history of domestic abuse and the risk posed to the woman. Women need to be asked as early as possible where they would feel safe to live and consideration needs to be given to the impact on future engagement with the RWC if it is not its local area. Other factors such as schools in the area (for women who stayed at the RWC with their children and those that are potentially separated from them by the RWC) and transport links are important.
- **Continuity of care** Delegates highlighted the importance of continuity of care when moving on from being a resident at the RWC. The need for the provider to assign women a key worker when joining the residential unit at the RWC was reiterated here. That key worker should wherever possible remain their main point of contact throughout their time at the RWC, including when they transition away from the residence but continue to access the support hub from the community.

- **Clear referral pathways** Clear partnerships, referral pathways and smooth handovers to support services must be in place. Referrals for example for substance misuse services should be made before leaving the residential element of the RWC to ensure the support is ready to start without delay. Delegates also reiterated their suggestion here for continuing multi-agency case meetings to support this.
- **Welfare** Delegates emphasised the importance of ensuring that welfare was arranged for those that need it so that there is not a delay in payments.
- **Independent living skills** It is important to have interventions and courses around independent living skills if they are needed. This should include access to banking and debt and money-management advice with tangible, achievable plans to repay debts. Some women may need support in setting up utilities for new accommodation and other practicalities.
- **Childcare** Mothers will need continued support with childcare – not just those residing with their children at the RWC - if they are to continue accessing services at the support hub.
- **Technology** There is a need to ensure women are equipped with the necessary technology when moving away from the RWC including smart phones and laptops to be able to access remote services, manage online applications, etc.
- **Training and employment** Some delegates suggested working with a voluntary sector organisation to run a social enterprise café at the RWC where women can access learning and employment opportunities. There are several examples where this has proven to be a successful model, for example restaurants and catering provided by The Clink and the model of training provided by London-based charity Switchback.

## Accommodation

Delegates continued to raise significant concern about the impact of women residing at the RWCs for at least three months if they already have tenancies. Delegates felt strongly that this would be highly disruptive, replicate the issues with short-term custody and risk women losing their tenancies, whilst simultaneously giving limited time to organise accommodation for women when they leave the RWC. **Overall, it was felt if a woman has settled accommodation she should be able to remain there whilst accessing services via the support hub.**

Accessing safe, suitable and stable accommodation for people in contact with the criminal justice system has been an increasing challenge over recent years<sup>4</sup> and is especially difficult for mothers with dependent children.

Delegates would therefore welcome more information on how MoJ intends to protect the tenancies for women who have them for the duration of their stay at the RWC and for those that don't already have accommodation secured, and how the department intends to work with local authorities and private renters to ensure availability of housing.

Some of the challenges with accessing accommodation are outlined below:

- **Emergency accommodation** Delegates highlighted that it is important not to use temporary emergency accommodation, for example bed & breakfasts, and ensure fully settled

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<sup>4</sup> See Clinks *State of the Sector research* available [here](#) and recent report on *The impact of Covid-19 on the voluntary sector working in criminal justice*, available [here](#), for how this pandemic has exacerbated accommodation issues.



accommodation. Otherwise, this creates an unstable environment for the women which would undermine their transition and resettlement in the community and the progress in their desistance journeys.

- **Defining what local means and engaging local authorities and housing providers** To ensure accommodation outcomes, local authorities and housing providers will be a crucial stakeholder that should be involved in the development and implementation of the RWCs from the earliest possible stage with sustained conversations throughout this process. Depending on how far the 'reach' of the RWC in Wales, this will likely require involvement from multiple local authorities. For example, South Wales covers three cities - Cardiff, Newport and Swansea – with 12 local authority areas all responsible for accommodation and housing. Focus also needs to be on working with local authorities to find solutions to criteria which often exclude or create barriers to housing for people in contact with criminal justice system.
  - **England** MoJ will need to work with local authorities around an RWC on recognising this client group as a priority need and addressing 'local connection' rules for people to be housed in certain areas. If for example an RWC brings women in from across the city or multiple cities where there are multiple local authorities, this will impact where they can access accommodation as they may not be deemed to have a local connection in some areas.
  - **Wales** In Wales, local authority guidelines or tests for housing around priority need and local connections are different to England. Therefore, it is vital that the processes in place at RWC in Wales reflects these differences and that there is an accommodation support service available with staff who have full understanding of housing and homelessness legislation in Wales.
- **Engaging landlords** Engaging with landlords to raise awareness and cooperation in supporting and accepting women moving on from the RWC will be vital. It is noted that money was allocated in the latest Spending Review to support prison leavers at risk of homelessness into private rental tenancies. More information would be welcome on whether projects or learning from this work could be applied to the RWC pilots as well as existing projects run by the voluntary sector.
- **Timescales and process** From the delegates' experience, 12 weeks is a very tight timeframe to organise settled accommodation and the department will need to work on ensuring a robust, established referral pathway for accommodation if this is to be achieved. Identifying a women's accommodation status must be a priority on entry to the RWC and work on sourcing accommodation must begin at the start of a woman's residency to ensure it is in place in time.
- **Dedicated staff and specialist services** RWCs need staff with specialist expertise on housing in the local area and they should have a direct line of communication with homelessness prevention officers from local authorities. It was also suggested the local authority homelessness prevention officers have dedicated days to work from or visit the RWCs to engage with the women and support their transition to new accommodation.
- **Mothers with dependent children** If women with dependent children are to move on to suitable, settled accommodation, there are specific challenges that need to be addressed especially where women have been separated from them as result of their stay at the RWC but wish to be reunited.

- **Maintaining tenancies** Concerns were raised around how long ‘settled’ truly refers to. Outcomes around accommodation in the criminal justice system are often recorded on a short-term basis as they are based on data only representing a snap-shot of when people are released from prison or on a probation caseload. Delegates outlined that women may also need support to maintain their tenancies on a longer-term basis and suggested follow-up monitoring is needed to ensure women from the RWC are still in accommodation six and 12 months after leaving the RWC.
- **Financial support** The sector would welcome further information on what financial support will be available for women moving into new accommodation. For example, some are likely to require support for deposits for privately rented accommodation or support for other practicalities such as furnishings.

It was also noted that the availability of accommodation will be crucial for deciding locations of the other RWC sites. Finding appropriate accommodation in rural counties within 12 weeks will be particularly difficult.

## Meeting the diverse needs of women

**Question:** What do you think we need to do to ensure the RWC caters for the diverse needs of women, including protected characteristics?

The discussion focused on ensuring that the RWCs are accessible to the diverse range of women that may come into contact with the criminal justice system and may be referred to the RWC, including women with additional protected characteristics and women facing multiple disadvantage.

Delegates reflected that eligibility was unclear for the RWC particularly for women facing multiple disadvantage. There was concern how the RWC would respond to a vast range of different needs that women may present with or those who may be at crisis point in a residential setting where 10 of 12 women are sharing living space. For example, the sector questioned what considerations had been made on appropriately building in detox and support mechanisms for women with substance addictions into the design of residential model or whether women with addictions would be excluded. Similar concerns were raised about support for women with mental ill health.

There needs to be a detailed understanding of the cohort of women likely to be engaged at the RWC before an RWC is launched in an area. Delegates stressed the importance of ensuring the RWC engages with a range of specialist services that provide support to specific cohorts of women. This is both for their expertise to inform the development of an RWC and to ensure once the RWC is up and running that there is continued availability of tailored services that meet the needs of different women. There should be a particular focus on ensuring services are available for groups of women that are over-presented in the criminal justice system or face disproportionately poor outcomes.

It is important to engage with a diverse group of women with different protected characteristics and diverse experiences about what provision, adaptations and services should be available at an RWC.

- **Physical accessibility** The sites – both the residential accommodation and support hub elements – should be accessible to people with physical disabilities. The MoJ should engage with specialist organisations to understand what features must be in place to ensure the site is as accessible as possible, with sufficient budget to make further adjustments if the need arises.

- **Learning disabilities, difficulties and neurodiversity** The delivery of services, communication, and materials at the RWC need to be adaptable so they can be accessible to people with learning disabilities or difficulties. Intervention or sentence plans for neurodivergent women must from the beginning be developed around this. The MoJ should also engage with specialist voluntary sector organisations to understand what adaptations may be needed. It is also common for neurodiversity, learning disabilities and difficulties to be undiagnosed or misdiagnosed for women that come into contact with the criminal justice system. Specialist staff must be available at the RWC to ensure accurate assessments.
- **Supporting women from black, Asian and minority ethnic (BAME) communities** To support women from BAME communities there needs to be:
  - **Training** In-depth, specialist training delivered to staff on cultural awareness provided by BAME-led organisations that specialise in delivering tailored support to BAME communities. This training should not be a one-off and needs to be an ongoing process to embed learning into the RWC.
  - **Specialist services** The RWC must engage with local BAME-led community groups and organisations that specialise in providing tailored support to BAME communities. Organisations and groups led by and for BAME communities will be better equipped to respond to the needs and experiences of women from BAME communities accessing the RWC's services and better placed to help them develop a stake in their local community.
  - **Accountability and space for discussion** There should be a forum, panel or group that provides a space for women from BAME communities and faith groups to discuss culture, diversity and their experiences at the RWC. This group can also act as a structure for accountability that actively involves BAME women on the treatment of BAME women at the RWC, enabling them to provide challenge and raise issues where change is needed. The group must have a clear feedback mechanism for updating the women on actions and progress made from their input. In recognition of the disproportionate outcomes and unfair treatment that BAME people often face in the criminal justice system it is important to prioritise work that proactively works with BAME communities to address the racism in the criminal justice system and the impact of conscious and unconscious discrimination.
- **Foreign national women** There should be access, via the RWC, to provision for women facing immigration issues and staff need an understanding of the distinct needs and experiences that foreign national women may face. There should also be access to translated materials and translators as required.
- **Religion** To ensure the RWC is accessible for women of different religions, it needs to provide access to prayer space, account for dietary requirements and consider what other adjustments must be made for example ensuring support services aren't delivered at a time when women need to observe their religion.
- **Transgender women** Ensuring that transgender women have the ability to access specialist support if needed and that there is understanding amongst staff of the additional barriers and discrimination they face.
- **Mental health** It is not uncommon that prior to contact with the criminal justice system, many people's mental health conditions go unrecognised and undiagnosed. Even once in the criminal justice system, mental ill health is often not identified and goes unsupported. There

must be professional assessments available when a woman comes into contact with the RWC and clear referral pathways for accessing support for mental health.

- **Dual diagnosis or multiple disadvantage** Though intersecting needs are mentioned in the draft specification, there needs to be an embedded understanding of how needs intersect, the impact on women's lives particularly where there is dual diagnosis and how this impacts access to mainstream service. Women with a dual diagnosis or experiencing multiple disadvantage can often be excluded from services or fall through the gaps in support. It is vital this does not happen and there is a person-centred and tailored response at the RWC.
- **Staff diversity** The RWC needs a diverse staff team that is ideally representative of the local demographic of the RWC population.
- **Welsh language** Access to translators and materials in the Welsh language is essential for the RWC site in Wales with staff equipped to support them accessing these.

## Additional feedback

Delegates were provided an opportunity for any additional feedback not covered by the four consultation questions.

## Empowerment and involving lived experience

A number of responses from delegates highlighted the importance of embedding lived experience into not only the development and implementation of the RWCs but crucially the ongoing running of the RWCs and everyday practice.

- **Accountability** Delegates highlighted the importance of ensuring that staff at the RWCs listen to and act upon the views and experiences of women residing there and engaging in the support hub. Women should have a formal voice in every RWC, enabling them to be involved in the scrutiny and accountability of practice at the RWCs and to be actively involved in finding solutions to challenges, decision-making and changes as a result. Pathways for inclusion could include forums, committees and scrutiny panels.
- **Co-production** Throughout the event, delegates regularly raised the importance of co-producing how the space should be designed, the development of policies at the RWCs and in the projects and programmes available. This will help to promote the inclusivity and accessibility of the services at the RWC to ensure they are relevant to the lives of the women accessing the hub and reflective of their experiences and needs. It will also better encourage women to engage in the services and support in their desistance journeys.
- **Staff with lived experience** A number of delegates highlighted the importance of hiring staff with lived experience of the criminal justice system as best placed to advice on policy and practice at the RWC, and engage and motivate women accessing the RWC.
- **Language** Some delegates noted that language such as 'offender', 'complex needs' and 'problematic behaviours' is counter-productive and disempowering. They therefore recommended these are not used.

## Children

The sector continues to express concern about the way in which children will be included in the RWCs. Having two 2-bedroom flats available for mothers staying with their dependent children, as outlined in the draft specification, creates several challenges:

- Two-bedroom flats will limit the number of children who can stay with their mother. This could either exclude some women from the provision or lead to siblings being separated.
- Once those two flats are occupied it will mean mothers will have to be separated from their children which is highly disruptive, damaging and traumatic for both the mother and children.
- Locating temporarily to the RWC for children will still be highly disruptive, and despite having a separate entrance, could still be a traumatising experience and potentially expose them to challenging circumstances.
- Women residing at the RWC will need support with childcare in order to engage in regular interventions.
- The potentially traumatising impact on other mothers at the site who will have been separated from their children or who have lost care of their children.

It was suggested that women with dependent children would be better supported to reside in the community as wherever possible, mothers and their children should not be separated to reside at the RWC.

If children are to reside at the RWC, this should be at a separate site to the support hub and other residents. Concerns were also raised about the lack of support proposed for children and it was reiterated that there should be specific safeguarding measures, dedicated support services and spaces for children, and childcare must be in place.

If mothers will be separated from their children as result of having to stay at the RWC, both will need support through this experience and visits and other forms of contact will be essential to maintain their relationship. 'Invisible Walls,' a project trialled at HMP Parc to support the parent-child relationship through forced separation was cited as an example of good practice to learn from.

Consideration will also need to be given to the support needed for women who are carers for others, not just children.

## The court stage

Delegates raised concerns around the practicality of the model at the court stage and would welcome further information on plans to work with courts and sentencers to deliver the pilots. Concerns included whether there is enough time required for the suitability assessment to take place at courts and how National Probation Service (NPS) staff at courts and sentencers would remain updated on the availability of spaces at the RWC. Questions were also raised about how close or far away courts had to be from the RWC for this to be presented as a viable option for them.

## Conclusion

We were pleased to host this event and welcomed the opportunity to consult the voluntary sector working in criminal justice on the development of the RWCs. We would be happy to facilitate further engagement between MoJ and the voluntary sector as plans for, and implementation of, the RWCs progress and would welcome further information from the MoJ about their timescale for this project.

## ANNEX A: MoJ responses to questions from delegates about the residential women's centres

Below is a table of the questions that delegates submitted during the Clinks December event for Ministry of Justice officials. As there was not enough time during the event to respond to them, we welcome the department's written responses that Clinks can circulate to the voluntary sector.

	QUESTIONS	ANSWERS
1	Does MoJ have timescales for the procurement for the first RWC and for when it will be set up?	We have already begun a site search in South Wales for the Wales RWC. Once we have acquired a building and refurbished it, National Probation Service (NPS) staff will be employed to use either the dynamic framework or direct commissioning to ensure the appropriate services are in place. Until we have acquired a building, gained planning permission and have planned for necessary refurbishments we will not be able to give an accurate timescale for setting up the Wales RWC.
Courts and sentencing		
2	Many women potentially eligible for the RWC will have committed offences that could be on the cusp of custody but also could receive a standard community or suspended sentence order. How will MoJ protect against 'up-tariffing' from a standard community order that would allow women to remain in their homes to a community sentence with an additional residential requirement over?	Women considered for the RWC will have received a pre-sentence report prior to sentencing. This will then be passed to the judiciary to determine the appropriate sentence. We will be raising awareness of the RWC and its target cohort with NPS staff and the judiciary in the few courts that we will anticipate will be sentencing women to attend the RWC during the length of the pilot. Our next iteration of the design specification, following our current engagement events, will set out the pathway to the RWC in more detail.
3	How will NPS court staff and sentencers be kept up-to-date on whether there is space in the residential part of the RWC?	NPS staff will be able to communicate with the NPS RWC centre manager.



4	How will MoJ ensure that there will be enough time at the court stage and adjournments for assessments of eligibility to take place including time for visits to the RWC? Has the department engaged with HMCTS in the design of this process?	<b>Yes we are working with HMCTS. Depending on the complexity of the case, we are anticipating that courts will be asked to adjourn for somewhere between 5 days and 3 weeks to enable a PSR to be undertaken and a visit to take place. Alternatively, if a woman is on remand, we anticipate that NPS staff will be able to share a leaflet/brochure about the RWC, and perhaps show her a video. Our next iteration of the design specification, following our current engagement events, will set out the pathway to the RWC in more detail.</b>
5	Will women convicted of a violent offence be eligible for the RWC?	<b>Only women deemed low or medium risk of harm will be eligible to reside at the RWC.</b>
6	If women don't follow the requirements of the RWC, will it result in recall to custody? Are there alternatives that will be put in place to avoid escalating to custody?	<b>Women attending the RWC cannot be recalled to custody as they are not serving a custodial sentence. Offender managers will deal with any breaches of a community sentence order in the same way as they do with any other such breaches and will consider the circumstances of the behaviour to make a decision on enforcement and a considered proposal to court which will include alternatives to custody.</b>
7	Will the sentence appear on the woman's criminal record as a standard community order would and will the same rules apply for when the conviction is spent?	<b>As women will have received a community or suspended sentence normal provisions for this type of sentence will automatically apply.</b>
<b>Location</b>		
8	Where in South Wales will the RWC be located?	<b>We are currently undertaking a site search.</b>
9	How far will women be expected to move for the RWC if residing there and how far will they be expected to travel to access services at the support hub? For example for the South Wales RWC, will women from Swansea, Newport and Cardiff be eligible and expected to attend the RWC – will women have to travel across a city or to another city?	<b>Once the residency requirement of 12 weeks has been completed women will need to continue to engage regularly with the RWC for the remainder of their sentence to complete their other sentence requirements and will therefore need to be able to travel there from their move on accommodation, or their existing home. We anticipate that women may be expected to travel for between 30 and 60 minutes to attend the RWC.</b>

10	Has other mapping of existing services begun in South Wales where the first RWC site will be located? What timescales does the department have for starting to engage local services?	<b>Yes, but as of yet we do not know the actual location of the RWC and so we have not begun to engage directly with local services.</b>
11	Is the intention to place the further four RWCs in areas where there is not an existing women centre already in place? If not, how does MoJ intend to ensure the RWC links up with existing women centres, many of which already work with the same cohort of women targeted by the RWC pilot?	<b>We are beginning to consider our location criteria for the English RWCs and our progress on developing these sites will depend on the outcome of this year's and next year's spending review. As with the Wales RWC the intention is that it will not duplicate or compete with existing provision but instead work with other providers.</b>
12	Can MoJ provide an update on what progress has been made in identifying potential areas for the other four RWC sites?	<b>Please see above.</b>
<b>Accommodation and transitioning from the residential site</b>		
13	Is the residential element of the sentence primarily targeted at women who are homeless/women that do not have settled accommodation? If not, it could replicate the harms of a short prison sentence in terms of having to leave existing accommodation. If this is the case and women with existing accommodation are required to reside at an RWC, how will the MoJ ensure women do not lose their tenancy in a 12 week stay with the RWC (or if a woman is required to stay on longer)?	<b>The provision is targeted at women with multiple and complex needs, there is no intention to prioritise those who have no settled accommodation rather it will be based on the needs of the individual women. It will be for the author of the PSR with the agreement of a woman to determine whether it is appropriate to recommend a woman attends an RWC. We are working with DWP to ensure that women can remain eligible for UC and we have been advised that a 12-week residency could be allowed within temporary absence provisions to enable ongoing support with housing costs.</b>
14	What plan or strategy does the department have for its proposal that settled accommodation will be 'ensured' for every woman? Will there be extra accommodation provision sourced to support women moving on from the RWC?	<b>We anticipate that there will be a housing officer on the staff of the RWC to support women seeking settled accommodation as soon as they enter the RWC. In addition this staff member will be able to support those with tenancies and other members of the community who will be accessing services at the RWC in maintaining their current accommodation.</b>

15	Finding accommodation for single women where there is no duty from the local authority to do so is extremely challenging. How will MoJ overcome intentionally homeless decisions made by local authorities or where the local authority has already otherwise discharged their duty to house the individual?	<b>Please see above.</b>
16	Can women reside for longer than 12 weeks at the RWC if move-on accommodation has not yet been secured?	<b>We aim for every woman leaving the RWC to be moving into settled accommodation or at the very least be supported into existing accommodation support pathways as appropriate for her needs.</b>
17	How will MoJ ensure that there are processes in place for women where returning to their home authority may pose a risk to them and/or be unwanted?	<b>This will be the role of the housing officer, in conjunction with the responsible Offender Manager, perhaps through the use of reciprocal arrangements.</b>
18	Will women receive any financial support when transitioning from the residential site at the RWC to new accommodation?	<b>We are working with DWP with the aim of ensuring that a woman will remain eligible for UC whilst she resides at the RWC and every woman will be supported through the transitions required to both move in and leave the centre.</b>
19	Will women have the same support staff they had when residing at the RWC when the move on from there to the support hub stage?	<b>Staff at the RWC, in conjunction with the responsible Offender Manager, will determine the best bespoke support for each woman. All women at the RWC will be subject to a probation supervised court order.</b>
20	How will women be supported to access services at the support hub following release from the residential element of the RWC? Will support be provided to cover transport costs for example especially if women are having to travel from across the city (or from a different city)?	<b>This will be in line with current expectations for women completing sentence requirements.</b>
<b>The residential site</b>		
21	Will women with lived experience be consulted and involved in the actual design of the RWC building (both residential and support hub elements)? If so is there a timescale for this engagement?	<b>Yes. We have already met with the Revolving Doors Agency's Women's Forum three times and will be similarly meeting with a group of Welsh women with lived experience in the new year.</b>
22	The draft specification states that women will be able to leave the RWC when residing there. What security measures will there be? Will staff be	<b>Our next iteration of the design specification, following our current engagement events, will set out this type of information in more detail.</b>

	able to stop women leaving the RWC or will there be times when women will not be allowed to leave?	
23	Will women have a budget for food, access to cooking space, and communal spaces to eat?	<b>We are working with DWP to ensure women remain eligible for UC and will therefore be able to buy and cook their own food. The intention is that there will be communal places for women to eat and meet. Centre staff will ensure that women who are not in receipt of UC have access to food.</b>
24	How will residing at the RWC impact universal credit claims and payments for example as it would going to prison?	<b>We are working with DWP to ensure women remain eligible for UC. The RWC is not a custodial environment, women will remain in the community setting and have full access to a broad range of support, interventions and services.</b>
25	Will there be appropriate facilities for those with substance addictions and for those going through detox? Or will there be criteria set to define where a person needs to be within their addiction journey in order to be eligible to reside at the RWC?	<b>Our next iteration of the design specification, following our current engagement events, will set out this type of information in more detail. As we will have children on site we need to assess all risks very carefully.</b>
26	If a woman needs longer than a 12 week stay, will there be flexibility to stay longer? If so will it be led by the woman's choice to do so or can probation staff require a longer stay without the woman's consent?	<b>We anticipate that women will be able to complete the residential requirement of their sentence in 12 weeks.</b>
<b>The support hub</b>		
27	How many women will the Support Hub have capacity for?	<b>We anticipate there being a timetable of interventions and activities at the RWC. Therefore the capacity of the Support Hub will be determined by the appropriateness and availability of that provision.</b>
28	Will the support hub be on the same site as the residential aspect or will they be at different sites? If the residential element of the RWC is located at the same site as the support hub, how will women who have experienced domestic abuse be protected if that is a public facing site?	<b>We are undertaking a site search at the moment but we are looking for a site that will offer co-located residential and support hub provision. The site will be public facing and therefore it might not be appropriate for some women to reside there.</b>
29	Will the support hub be a drop-in centre or appointment-based?	<b>This will depend on the interventions and activities.</b>

30	Will the RWC have requirements to hire staff with lived experience or have proactive processes in place to encourage applications from people with lived experience?	<b>We would welcome the opportunity to include staff with lived experience.</b>
31	Will the support hub be used for meetings between women and offender managers as alternative to going to NPS offices?	<b>Yes as appropriate.</b>
32	Will the RWC be staffed only by women? As there are likely to be offender managers and staff from other providers who are men that will come on site, will there be dedicated space at the RWC that stays women only?	<b>Yes the RWC will be a women only space and any requirement to have male staff or visitors will be managed sensitively and discreetly with the co-operation of the residents. We anticipate there may be male offender managers, interventions staff, or maintenance staff visiting the site and there will be facilities to support family visits for those residing at the RWC.</b>
33	Will all staff at the RWC have appropriate domestic abuse and trauma-informed training?	<b>Yes.</b>
34	Currently the specification refers to support for domestic abuse and sexual violence. Will there also be tailored support available for women who have been affected by sexual exploitation and will this be reflected in the RWC specification to ensure consistency of provision?	<b>Yes.</b>
<b>Children</b>		
35	Will the support hub have on-site childcare available?	<b>We anticipate on site childcare or working with a provider of childcare very near the site.</b>
36	Aside from childcare, what other dedicated support will there be available for children living on the RWC site?	<b>Our next iteration of the design specification, following our current engagement events, will set out this type of information in more detail.</b>
37	Will there be an age limit for boys allowed to reside at the RWC with their mothers or for those that attend the RWC with their mothers?	<b>We anticipate that women will primarily be accompanied by pre-school children as older children will have their education disrupted by a stay at the RWC. The separate flats will have all the necessary facilities for a family staying there so there should be no need for older children to attend the RWC with their mothers unless it is for a family visit, or to meet a family support worker or other form of intervention.</b>

38	Will mothers residing at the RWC who have older children be able to have their children visit?	<b>Yes. There will be facilities for family visits.</b>
39	If visits from children are allowed for women residing at the RWC, how will this be managed for example will there be a visiting room and specific visiting hours? Will other family members or loved ones be able to visit including partners that may be men?	<b>Yes there will be facilities for family visits and we anticipate that some visitors will be men. It will be for the Centre Manager to manage visiting arrangements.</b>
40	What support will be in place for the women who are not able to be accommodated with their children (up to 10 out of the 12 women)?	<b>Statistics indicate, and this is backed up by the experience of the current providers of RWC style services, that very few women who are likely to be eligible for the RWCs will have resident dependent children at the time of sentencing unfortunately. It is on this basis that we have set aside two of the twelve spaces for women with dependent children. In addition some women with dependent children may choose not to bring them with them either because it disrupts their schooling or their wider social contacts or because they would rather focus on their rehabilitation particularly if they have a partner or family who can look after the children whilst they attend the RWC. However the RWC is a pilot and if we find this is incorrect we can amend provision at roll out.</b>
<b>Commissioning</b>		
41	Can MoJ share the overall financial envelope for the RWC pilots?	<b>As of yet we are unable to do this.</b>
42	Does MoJ have an idea of cost per RWC and how much does this equate to per woman staying at the RWC? How are you ensuring optimal impact of this investment compared to alternative forms of support?	<b>We have sought information on likely costs from a number of different sources including existing providers of RWC-style services and approved premises. We will be evaluating the pilot to determine its impact.</b>
43	Will the residential site, support hub and move-on elements of the service be procured separately? Could there be a different provider for the residential unit and the support hub?	<b>We anticipate the facilities being co-located and are currently undertaking a site search with intention of either buying or leasing an appropriate co-located site. The NPS will be managing the RWC. We will need to procure elements of the RWC provision such as providers of interventions, facilities management etc</b>



44	Will contracts and grants cover capital and revenue funding (i.e. from initial build and design through to running the RWC)?	<b>MoJ will acquire and refurbish the site in Wales and there will be revenue funding for the procurement of interventions.</b>
45	How will the RWC fit with the current contract lot for women's services on the probation dynamic framework? The draft specification notes that there will be opportunities to commission services outside of the dynamic framework. How will that work - what mechanisms will there be for direct commissioning by the RWC?	<b>We will use standard government approaches to commissioning the provision of services.</b>
<b>Data and monitoring</b>		
46	How will client data will be managed and shared securely? Will there be an integrated service where data and IT systems are shared between NPS on site and service providers?	<b>The RWC will be managed by the NPS and will therefore use the same case management systems and be bound by the same data protection and information sharing agreements and protocols that are already in use.</b>
47	How will the RWC outcomes be measured? Who will be measuring these?	<b>We will be evaluating the RWC pilot. As of yet we do not have a contractor to undertake this work.</b>