

RRP – External stakeholder’s comments and review document

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EXPECTATIONS: Criteria for assessing the treatment of and conditions for women in prison

Women are prepared for their release back into the community and effectively helped to reduce the likelihood of reoffending.

Strategic management of resettlement

Planning for a prisoner’s release or transfer starts on her arrival at the prison. Resettlement underpins the work of the whole prison, supported by strategic partnerships in the community and informed by assessment of prisoner risk and need. Good planning ensures a seamless transition into the community.

Comment

- Resettlement poses particular challenges for women’s prisons because of a) the proportion of women given very short custodial sentences, b) the likelihood they will be imprisoned far from their home area, c) the possibility that they may need to relocate on release due to domestic abuse and coercive relationships and d) the probability they have caring responsibilities for children and/or other dependents. The Expectations and Indicators need to reflect this reality.
- This makes it particularly important that the prison has all the relevant information about a woman’s resettlement needs as early as possible, where possible informed by a written pre-sentence report.
- Due to the prevalence amongst women sent to prison of histories of sexual and domestic abuse it may be difficult for women to disclose relevant information about their needs and circumstances to prison officers, particularly male prison officers, so women should be given the option of interview by a woman prison officer wherever possible, and/or their consent obtained to seek information from a women’s support organisation with a presence in the prison.
- Throughout this section, inspectors should ensure that the resettlement needs of older women are being considered and provided for. It is easy for older women to be overlooked when much of resettlement is about education and employment which may not apply to them. See the PRT/Restore research report [Social care or systematic neglect](#) (Neil Cornish, Kimmitt Edgar et al, 2016) which found older people’s resettlement needs were not being met.
- Following the publication and implementation of the reviewed ROTL policy this year, we are concerned that provision for women has been negatively affected
 - o in particular by decisions to limit support with travel fare and by the restriction of choice to take unpaid work in at least one prison. The rehabilitative value of ROTL should be available to all eligible women, should offer choice and flexibility according to their aspirations and resettlement needs, and should be adequately funded to account for the additional distances from home that women are often held.
- Effective resettlement provision is dependent on a detailed knowledge of services and support in the areas women are returning to after release, and effective links with relevant agencies. Given that women’s prisons hold people from much wider geographic areas, resettlement services must be adequately resourced to be able to achieve this.

1	The needs of women are met by effectively coordinated and targeted resettlement services that draw adequately from external statutory and voluntary agencies, as well as internal resources.
Comment	<ul style="list-style-type: none"> - A comprehensive strategy, developed in consultation with the women in the prison, shapes resettlement services . - The indicators do not meet the standard set by the Bangkok Rules (Rule 45) which states that the options of home leave, open prisons, etc should be used ‘to the maximum extent possible’ for women prisoners - Programmes, activities and services that seek to aid resettlement should meet women’s individual needs (Mandela Rule 4) - Resettlement services should take into account the person’s ‘social and criminal history, physical and mental capacities and aptitudes, personal temperament’, sentence length, and ‘prospects after release’ (Mandela Rule 92) - Prisons should ensure that programmes and services are tailored to women’s religious and cultural needs. They should do this in collaboration with women in prison, and community groups. Involving community groups in programme design and delivery helps maintain links between prisoners and the communities they come from (Bangkok Rule 54) - Care should be taken to avoid seeing women’s needs as risk factors, which can result in higher levels of security than necessary (Bangkok Rules 40-41)
2	Women’s needs are met and the likelihood of reoffending reduced by a ‘whole prison’ approach to resettlement which begins on their arrival.
Comment	<ul style="list-style-type: none"> - Assessments in induction include a full account of a woman’s strengths (skills, and motivations), and these are clearly referenced in any sentence plan - Resettlement programmes should be designed ‘after study of the personality of each prisoner’ and be shaped by their ‘individual needs, capacities and dispositions’ (Mandela Rule 94) - There are regular consultations with women prisoners about how resettlement services are addressing their practical needs and what should be done to improve them. - Alongside the prison, women’s resettlement needs should be met in cooperation with probation and community groups (Bangkok Rule 46)
Offender management and planning All women have a sentence based on an individual assessment of risk and need, which is regularly reviewed and implemented throughout and after their time in custody. Women, together with all relevant staff, are involved in drawing up and reviewing plans.	
Comment <ul style="list-style-type: none"> - The sentence plan should be based on the woman’s strengths rather than a process which conflates risk and need, which is a recurring failure of the criminal justice process as it applies particularly to women. - As suggested in the opening comment, sentence management and planning need to reflect sentence length rather than an unrealistic model that has limited functionality for very short-sentenced prisoners. - Prisons need to get much better at assessing need on a woman’s arrival into prison so they can make an effective plan – whether this is through the Basic Custody Screening Tool or Oasys – and the process for doing this must reflect awareness of and sensitivity to many women’s histories of abuse and trauma. 	

3	Each prisoner's risk of harm to others is kept to a minimum and their likelihood of reoffending reduced.
Comment	<ul style="list-style-type: none"> - Risk of harm to others and likelihood of reoffending should be separated into two separate sections as they are different - Current indicators are male expectations grafted onto the women's expectations with little consideration for gender differences in offending. - Bangkok Rule 1: "account shall be taken of the distinctive needs of women prisoners in the application of the Rules." - A women-centred resettlement plan must be based on applying the minimum necessary security – most women are imprisoned for minor, non-violent offences and even where the offence involves violence it is commonly at the lower end. Offence categories are broad so eg conviction for an assault offence could involve a wide spectrum of behaviour; women are more often imprisoned for a first offence than men so it is important for prison regimes to reflect the likelihood that only a small minority of women received into prison have committed what would be understood as serious offences. - Assessments of women's risk to others should be balanced with assessing risk to the woman herself. - Bangkok Rules 41: "<i>The gender-sensitive risk assessment and classification of prisoners shall: (a) Take into account the generally lower risk posed by women prisoners to others, as well as to the particularly harmful effects that high security measures and increased levels of isolation can have on women prisoners.</i>" - The Corston Report made clear that the priorities in preventing reoffending by women should be to focus on social factors, such as housing, financial management support, benefits, and parenting; and personal care, including mental health support. More recent evidence shows the extent to which women's reoffending is driven by coercive relationships with men – see for example PRT report There's a reason . - Assessments of a woman's risk of reoffending should prioritise social needs, circumstances and mental health. Taking into account resettlement expectations 18 (accommodation) to 20 (health care) to say "sentence plans are based on the likelihood of reoffending and the risk of harm to others" favours approaches that locate the problem of reoffending in deficits in the woman's personality. - Housing is a chronic area of unmet need and a factor identified in PRT's research on women's recall to prison – Broken Trust – as well as our briefing Home Truths. - Assessments of a woman's risk of reoffending must be conducted in discussion with the prisoner about her perspective on her risks.
4	Women understand and are motivated to meet sentence plan targets and are supported at the prison in their efforts to achieve them.
Comment	<ul style="list-style-type: none"> - Women should be given a copy of their sentence plan as soon as possible and their understanding of it checked. - They should have regular meetings with staff to assess their progress
Public protection	
5	Any imposed restrictions or requirements placed on women are proportionate to managing their risk and protecting the public. Women are appropriately assessed and decisions are clearly communicated .
Comment	<ul style="list-style-type: none"> - Security levels should vary based on the needs of different prisoners (Mandela Rule 89) - 'Security measures to which prisoners are subject should be the minimum necessary to achieve their secure custody' (Mandela Rules 40-41)

Allocation	
6	Women are located as close to home as possible , in prisons that are able to meet their resettlement needs.
Comment	<ul style="list-style-type: none"> - 'The treatment of prisoners should emphasize not their exclusion from the community but their continuing part of it' (Mandela Rule 88) - Prisons should use home leave and open prisons as much as possible (Bangkok Rule 45) - Women's contact with their families should be encouraged and facilitated by all reasonable means. Where possible, measures should be taken to counterbalance disadvantages faced by women in prisons far from their homes (Bangkok Rule 26) - Prisons should find ways to encourage and facilitate visits to women in prison, for example assisting with transportation, extending the length of visits, providing free, overnight accommodation for families travelling long distances, offering increased phone-calls to women whose family are unable to visit, reducing or eliminating charges for phone calls, granting prison leave on medical, educational, occupational and family grounds as often as possible, facilitating e-mails and video messages (Bangkok Rule 43) - The reality is that most women are held a long way from home, and this is a challenge that women's prisons must be adequately resourced to meet so that women's access to ROTL and the frequency of visits are all maximised not jeopardised.
Indeterminate sentence women	
7	Women serving an indeterminate sentence (including those serving sentences for public protection) and those on long sentences are informed of and understand their sentence. They receive specialist advice and support to enable them to progress in their sentence .
Comment	<ul style="list-style-type: none"> - The indicator should state 'women serving an indeterminate or extended sentence...' - Women's families and support networks are also provided with information regarding their sentence, kept informed and involved as appropriate
Reintegration planning	
Women's resettlement needs are addressed prior to release. An effective multi-agency response is used to meet the specific needs of each individual prisoner in order to maximise the likelihood of successful reintegration into the community.	
Comment	
8	All women, including those on remand or serving short sentences, have a custody plan that includes targets to address identified resettlement needs . These targets are monitored and reviewed until the point of release.
Comment	<ul style="list-style-type: none"> - This expectation should specify that plans are produced and shared with women as soon as possible at the beginning of the sentence and within a maximum specified period /deadline.
9	Women, at the point of release, receive adequate provision for re-entering the community .
Comment	<ul style="list-style-type: none"> - Arrangements should be made in advance, rather than last minute. In particular, where a woman will live should be arranged in advance. Her probation worker will have responsibility for supporting her re-entry (ORA 2014 post custody supervision) but often it will be a community based women's service that will provide woman with the advocacy and support she needs to secure housing, reunite with her children etc. - Indicators should include a prison's links with local women's support services.

	<ul style="list-style-type: none"> - Prisoners should be enabled to gradually return to life in society. They might have a pre-release regime, or be released under supervision, combined with effective social support (Mandela Rule 87) - Women released from prison should be given aftercare to lessen prejudice against them and to facilitate their social rehabilitation (Mandela Rule 90) - Women should be able to save part of their earnings into a fund that is given to them on their release (Mandela Rule 103) - Released prisoners should be provided with appropriate documents and identification papers, they should have suitable homes and work to go to, be adequately clothed, have sufficient means to reach their destination and to maintain themselves in the immediate period following their release (Mandela Rule 108) - After release from prison, women should be given any necessary psychological, medical, legal and practical help to ensure their successful reintegration (Bangkok Rule 47) - Women can have particular post-release needs that should be met. For example, they are more likely to suffer discrimination after release, might experience family rejection, and if they have left a violent relationship, might face particular economic, social and legal difficulties. Women are more likely than men to have received mental health treatment in prison, and might need continued mental health care post-release (Bangkok Rules 45-47)
Children, families and contact with the outside world	
10	Women's family situations are identified and support plans are developed to proactively assist them in maintaining contact .
Comment	<ul style="list-style-type: none"> - Upon admission to prison, details of a women's family should be recorded, including, where applicable, their children's ages, locations and guardianship status (Mandela Rule 7) - Women in prison should be enabled to inform their family if they are transferred to another institution, or have any serious illness or injury (Mandela Rule 68) - The recommendations of the Farmer Report 2 (Importance of Strengthening Female Offenders' Family Relationships, June 2019) must be factored into the Expectations - Recognition of women's exposure to abusive relationships needs to be reflected in the expectations and indicators – so for example all women should have the opportunity to participate in eg the Freedom Programme or similar, and a healing Trauma programme to help build resilience and develop coping strategies. As mentioned above, barriers to women's disclosure of abusive family relationships need to be addressed.
11	Women and their families receive ongoing active support to maintain or re-establish relationships , where it is appropriate.
Comment	<ul style="list-style-type: none"> - Social workers in prisons should help prisoners maintain and improve family relationships (Mandela Rule 88) - Women should be given particular support in cases of family illness or bereavement - When disabled family members are unable to write/phone/visit, alternative arrangements should be provided
12	Women have sufficient access to visits to sustain healthy relationships with their children and families . Women are aware of the prison procedures and their visits entitlements.
Comment	<ul style="list-style-type: none"> - Women's family contact should not be limited by disciplinary sanctions (Bangkok Rule 23) - On the principle that children should not be disadvantaged by sanctions applied to their mother, family contact should not be restricted for women prisoners on the basic regime.

	<ul style="list-style-type: none"> - Women in prison should be allowed to send part of their earnings to their family (Mandela Rule 103) - Women should also have sufficient access to other means of communication, including phone calls and video calls
13	Prisoners and their visitors are able to attend visits in a clean, respectful and safe environment which meets their needs.
Comment	<ul style="list-style-type: none"> - Visits involving children should take place in an environment conducive to a positive visiting experience, including with regard to staff attitudes. Open contact should be allowed between mother and child, and extended contact with children should be encouraged. The visits environment should be child-friendly (Bangkok Rule 28) - Particular care should be taken to ensure that children do not find the experience of visiting traumatic. Women might refuse to accept visits from their children if they believe that staff will treat them insensitively (Bangkok Rule 21) - Please also see the recommendations in the PRT report What About Me? The Impact on Children when mothers are involved in the criminal justice system (2018) – especially the recommendations pp 40-41 directed at prison governors and the recommendation to criminal justice inspectorates that they should “monitor and report on support for children affected by maternal imprisonment, highlighting models of good practice”. - The costs of children’s visits must be met by the MoJ/HMPPS and should not fall on individual women and their families.
14	Women are actively supported to maintain contact with children and families through regular and easy access to mail, telephones and other communications.
Comment	<ul style="list-style-type: none"> - Prisons should offer increased phone-calls to women whose family are unable to visit, reduce or eliminate charges for phone calls, grant prison leave on medical, educational, occupational and family grounds as often as possible, facilitate e-mails and video messages (Bangkok Rule 43) - Phones should be available in cells to enable phone calls in private and at times convenient for family members and children. Phones in communal areas need privacy. Phone calls should be cheap enough to allow regular contact even for women who are not in work and don’t receive money from outside.

Victimisation, abuse and vulnerability

15	Women who have been the victim of abuse, rape or domestic violence are identified and supported to address their specific needs.
Comment	<ul style="list-style-type: none"> - Any disclosures of abuse, rape or domestic violence should be checked against the woman’s offending history to explore potential links with a view to providing appropriate advice and support. - Any woman who discloses rape shall be advised of her right to seek recourse through criminal courts and fully informed of the procedures involved. (Bangkok Rule 7.1.) - The prison ensures that any woman who discloses abuse, rape or trauma has immediate access to specialised psychological support or counselling (Bangkok Rule 7.2) - As above – access to Healing Trauma and similar programmes must be available to all women received into prison.

16	Women are encouraged to disclose any involvement in prostitution and are given access to information and support to address their specific needs.
Comment	<ul style="list-style-type: none"> - Women's prisons should be resourced to ensure appropriate women's support services are available Through the Gate – organisations like Changing Lives in Newcastle specialise in providing support to women involved in prostitution, and most women's centres include this in their offer to women who may be at risk, especially the risk of 'survival sex' if released from prison homeless and jobless and only £46 to last them for the weeks until a Universal credit claim comes through. - Also see Bristol University research just published by the Home Office
17	Women who are potential victims of human trafficking are supported and referred to appropriate community services.
Comment	<p>Please see the recommendations of the PRT report Still No Way Out, and concerns that there remain significant shortcomings in the identification of trafficked women in prison.</p> <p>Women's prisons should engage with specialist women's organisation such as Hibiscus to improve levels and consistency of support.</p>
Accommodation	
18	All women have suitable, sustainable and safe accommodation arranged prior to their release.
Comment	<ul style="list-style-type: none"> - Accommodation should be at the top of resettlement expectations. Under the Homelessness Reduction Act 2017 the prison notifies the local authority of everyone at risk of homelessness on release in good time for the local authority to meet its housing duties. However, women are at risk of having no 'local connection' because of being imprisoned far from home, or being classed as intentionally homeless for having offended, and there are likely to be additional challenges around reuniting with children. Every woman's housing need must be carefully identified and a key worker tasked with helping to secure housing for the woman. - See PRT's Home Truths briefing as referred to above. - Prison resettlement services are alert to the possibility of conflicting release conditions, such as housing offered too far from a job she has secured or too close to abusive ex-partner.
Education, training and employment	
19	When transferred or released, women enter appropriate education, training or employment.
Comment	<ul style="list-style-type: none"> - Education should not only be regarded as a tool of resettlement
Health Care	
20	Women with continuing health and social care needs are prepared and assisted to access services in the community prior to their release.
Comment	<ul style="list-style-type: none"> - We recommend that continuity for health and social care needs is separated into two separate expectations to ensure that the emphasis and differing responsibilities for social care needs is not lost. Reference should be made to responsibilities on prison to identify, refer and make information available under the Care Act 2014.

Drugs and alcohol	
21	Women with drug/alcohol problems are prepared for release and have access to appropriate support and continued treatment in the community.
<u>Comment</u>	
Finance, benefit and debt	
22	Women with financial commitments/problems are identified and receive effective advice and support to manage them while in custody.
<u>Comment</u>	
23	Women have the opportunity to gain the knowledge and skills required to manage their finances adequately in prison and on release.
<u>Comment</u>	
Attitudes, thinking and behaviour	
24	Women have access to interventions that produce a positive and demonstrable change in attitudes, thinking and behaviour.
<u>Comment</u>	- Interventions demonstrate a strengths-based approach to women, building their confidence by enabling them to practise self-determination.