



Draft Women's Estate Case Advice and Support Panel (WECASP) Policy Framework CONSULTATION FEEDBACK PRO-FORMA

Last year we started work on the fundamental review of PSI 23/2015 *Centralised Case Supervision system (CCSS) for Restricted Status women and women with complex needs* which provided us with the opportunity to review the existing process whilst converting the current PSI into a Policy Framework and adopting a new name in replace of CCSS.

We have been grateful to receive input from a wide range of stakeholders, including prison and probation staff, NHSE, the Parole Board, and a variety of HMPPS HQ departments that contribute to this area of work.

We have now drafted the new Policy Framework document which includes a level of guidance that will support operational staff in understanding the practical aspects of the process, but also how this policy is aligned with other disciplines and policy areas. The document also includes some helpful annex's which staff may also find helpful.

We would like to invite our colleagues, partners and stakeholders to provide written feedback on the draft documents by **COP Monday 18 January 2021**, using this pro-forma. Please do not provide feedback using tracked amendments to the drafts themselves, as we will not be able to take these into account.

Once completed, please return this form to Leanne.packham1@justice.gov.uk with the subject heading marked as 'WECASP PF Feedback' including your name and title or organisation. We ask that teams / establishments / Probation regions collate feedback and provide one joint response.

Thank you!

DRAFT POLICY FRAMEWORK

1. General

1.1 Presentation and formatting		
Does the presentation and formatting of the full document (both Policy Framework and guidance) make it easy for Governors/Directors/Regional Probation Directors and staff to follow and reference.		
Page Number	Paragraph Section	Comments
		The presentation and formatting should take into account the accessibility needs of women in prison and their family members as well as the staff referenced above. This is because women in prison and family members often use published policy documents as a reference to help understand the steps being taken and to help them judge if the treatment and decisions are fair and according to mandatory actions and guidelines. Therefore, it is important that the formatting makes it easy for both women in prison and family members to follow and reference.

1.2 Accessibility		
Is the full document (both Policy Framework and guidance) written in a way that is easily understood by staff with diverse needs, a challenging job and limited time? Do requirements assume knowledge not otherwise available or known to Governors/Directors/Regional Probation Directors and their staff?		
Page Number	Paragraph Section	Comments
		Again, we highlight the importance of the full document being easily understood by women in prison and their family members. We recommend the addition of annexes which include guidance for women being referred to or supported by WECASP, these should include easy read versions.

2 Specific Policy Framework sections

2.1 Introduction		
Please set out any feedback or suggestions relating to the introductory sections of the document that include the purpose, principles, outcomes and structure (pages 5-6).		
Page Number	Paragraph Section	Comments
5	1 - Purpose	We welcome the positive language used in the guidance sections of this document. Such language is more aligned with the language and principles in the government's Female Offender Strategy . We would highlight the importance of bringing more of this positive language to the forefront of this document and including it in the purpose section. In particular, benefits for the women involved should be explicit in WECASP's purposes.
6	3 - Outcomes	There is a gap in this section when it comes to what outcomes are expected for women that are under the WECASP process. We question where the women's voice is able to be heard, and at what point the process or possible outcomes are explained to them. Women's voices should be at the forefront of this section and throughout the document.
6	4 - Structure	<p>We note the entire membership of the board is internal and that no one on the board is there specifically to look after the interests of the woman. We recommend real attention is given to this, and consideration is given to including a member from outside the prison to look after the needs of the woman. This could include a member of the Inspectorate or member of the Prison and Probation Ombudsman for example.</p> <p>We would also question why an Equalities representative is not part of the core WECASP membership and would recommend remedying this.</p>

2.2 Requirements		
Please set out any feedback or suggestions relating to the requirements section for all areas in this document (pages 7-14).		
Page Number	Paragraph Section	Comments
		<p>We would defer on most of this section to agencies with more detailed knowledge on the process.</p> <p>However, we would highlight that there is very little inclusion of the individual in this process. For example, the document does not mention consulting with the individual around referral, informing the individual of</p>

		what case acceptance means for them etc. More emphasis should therefore be placed on communicating and supporting the individual who will be subject to the WECASP arrangements and as above, ensuring the woman's voice is heard and that the process is person centred.
7	5.1 - Referrals	There should be a presumption outlined that anything seen by the decision maker is also seen by the woman.

2.3 Any Additional Comments

Please feel free to provide any additional comments on the Policy Framework

Page Number	Paragraph Section	Comments
No additional comments		

3 Guidance sections

3.1 Part A – WECASP

Please set out any feedback or points of accuracy relating to the chapters in this section of the document, including the ease of navigating to particular topics for assistance (pages 15 – 23)

Page Number	Paragraph	Comments
14-15		We welcome the clear explanation of what WECASP means and agree that the background information is particularly useful.
20	7.8 – Trauma informed and responsive approaches for WECASP boards	We welcome the inclusion of this section. Particularly in regards to the trauma informed training, and assume this includes those on the WECASP board, if there is any doubt on this, reference to training the board members should be explicitly included in the document.
23	7.10.1 – 7.10.4	We welcome the refusal to define complexity and note that any list of factors is indicative rather than exhaustive. This allows the process to take account of women as individuals as opposed to a tick box exercise.

3.2 Part B – Referrals and Acceptance

Please set out any feedback or points of accuracy relating to the chapters in this section of the document, including the ease of navigating to particular topics for assistance (pages 24 – 31)

Page Number	Paragraph	Comments
24	7.11 - Referrals	<p>As highlighted above, there should be a presumption outlined that anything which the decision maker is seeing is also seen by the woman.</p> <p>As we have recommended throughout this document, women should be consulted, communicated with and supported throughout. They should have an explicit chance to input their views on their referral, and should be told when they have been accepted or rejected.</p>
26-27	7.11.18 – Board consideration	<p>We strongly recommend that there be an opportunity for face to face dialogue with the women who are being considered, and this should be at the board meeting. Such representation is crucial to ground decisions.</p> <p>To best enable a woman to speak up in these meetings, she should be supported by a key worker. She should have an initial face to face meeting prior to the board meeting, where the key worker is present, in order to explain the process to her, review any documents and answer any questions she may have, so she feels fully supported.</p>
27	7.11.19 - Decision	<p>We recommend the decision be made with involvement of families from outside prison.</p> <p>We recommend the inclusion of a paragraph to state that the individual being considered has the right to appeal and a reasoned response for any decision outcome. There should be a readily available option to get help from outside, and the individual should be clearly shown how and where to get this help.</p>
29-30	7.15 – Exiting the WECASP	<p>Women should be involved in the decision making process for exiting the WECASP, and should be kept fully informed at all stages of the process. Information should also be regularly provided to the women about support they will receive and under what circumstances they would exit the programme.</p> <p>There should also be the inclusion of a review. The review should be triggered for example if someone has been on the WECASP for 12 months. This review should fully involve the woman as well as having external input.</p>

3.3 Part C – Consideration to other disciplines

Please set out any feedback or points of accuracy relating to the chapters in this section of the document, including the ease of navigating to particular topics for assistance (pages 32 – 40)

Page number	Paragraph	Comments
31	7.16 – Offender Management	We welcome the clear point that WECASP does not replace Offender Management.
36-37	7.21 – Transgender Complex Case Boards	We welcome the emphasis that not all transgender women in the women’s estate will be referred for WECASP, this is an important guard against WECASP becoming a catch all provision.

3.4 Part D – Information Management

Please set out any feedback or points of accuracy relating to the chapters in this section of the document, including the ease of navigating to particular topics for assistance (page 41)

Page Number	Paragraph	Comments
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3.5 Any Additional Comments

Please feel free to provide any additional comments on the guidance sections

Page Number	Paragraph	Comments
Below we have listed additional general comments on the document provided:		
<p>We would again highlight the need for involving women in all parts of this process. This document does not include enough reference to this. The individual should be involved throughout the process, with clear communication on what is going on and support throughout.</p> <p>There should be a standard information leaflet which clearly explains the WECASP process, which should be given to all women at the start of this process.</p>		

Recent Policy Frameworks published by HMPPS have often made effective reference to procedural justice, setting out the principles clearly and how they are relevant to the particular policy. We think it is important to set this policy within procedural justice, particularly in relation to the process, decision making and clear communication to the women involved. Most important, however, is that WECASP ensure that the voices of the women involved are heard throughout the process.

There should be monitoring of which women are accepted on the WECASP, there is currently no equality analysis and this needs to be remedied.

To prevent a sense that the process is punitive, WECASP processes should make explicit the benefits to women who are referred. Communications with the women involved should specify the ways in which her interests will be taken into account at all stages.

A real way of evaluating if WECASP is effective is by asking the women themselves, so there should be feedback opportunities for them during and after exiting WECASP.