



Welsh Women's Aid response to UK Government Strengthening Probation, Building Confidence

Name:	<i>Elinor Crouch-Puzey, Policy and Research Officer</i>
Organisation:	<i>Welsh Women's Aid</i>
Email address:	<i>EliCrouch-Puzey@welshwomensaid.org.uk</i>
Telephone number:	<i>02920 451 551</i>
Address:	<i>Pendragon House, Caxton Place, Pentwyn, Cardiff CF23 8XE</i>
These are the views of:	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales (comprising our membership of specialist services and members of the regional VAWDASV Specialist Services Providers Forums).ⁱ These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

We also deliver direct services including, for example, the Welsh Government funded Live Fear Free Helpline and a National Training Service partnership. . We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform improvements in public services and commissioning frameworks, and help change attitudes.

We also deliver the Wales National Quality Service Standards, a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)



Summary of Recommendations;

1. Continual supervision to be a requirement, including face to face supervision for the highest level domestic and sexual violence offenders
2. Domestic violence offenders to be required to attend Respect accredited perpetrator programmes
3. Women's centres to be properly resourced, fully accessible and adequately funded to ensure an effective response to vulnerable women
4. Third sector to be supported to contribute to assessments and pre-sentence advice and relevant details of domestic and sexual violence abuse to be included in assessments
5. UK Government to introduce robust systems to monitor sentence requirements for domestic and sexual violence offenders
6. Effective multi-agency working to be facilitated by ensuring clarity on supervision arrangements and who the lead partner is
7. UK Government to mitigate the impact on children by prioritising community sentences for women over imprisonment
8. The chronic lack of appropriate accommodation for women involved in/exiting the CJS to be urgently addressed
9. UK Government to implement in full the Corston Report recommendations
10. Strategies to support BME women in the CJS must include BME specialist organisations
11. Agencies to identify early on the needs of women they are working with and include this in decision making about diversion, arrest, charge, bail, conviction and sentencing
12. cross-agency working between specialist women's organisations and probation services must be facilitated to support women who have experienced trauma and abuse before they offend and divert them from custodial sentences
13. National Police Chiefs Council to commit to working within a model that aims to divert women from custodial sentences
14. Resettlement services to be gender informed, with a clear awareness of coercive control and the risk posed to women on release from prison who do not have alternative accommodation away from perpetrators
15. Childcare needs of mothers must be considered when designing community orders
16. Supervision to be tailored to women's needs and short custodial sentences for women to be abolished in cases of non-violent crime and replaced with community orders.
17. Training and qualifications for probation staff to be clearly regulated with clear roles and agreed definitions, and development of training to have third sector involvement. Probation officers to have attained competencies in the identification of and response to domestic abuse/coercive controlling behaviour and sexual violence
18. A Professional Register must include any contracted private providers of Probation Services, offender managers in prison services and youth offending professionals to ensure they meet the recommendations made
19. CRC supply chain in Wales to widen Welsh voluntary sector involvement
20. Any reforms to MOJ commissioning to include third sector agencies in mechanism design
21. CRCs and the NPS should publish, quarterly, full details of their supply chains, including: the names and company/charity numbers of tier two and three providers; the amount of funding passed down to sub-contractors; a summary of the service being provided; and where



- appropriate the contribution that these organisations have made to Key Performance Indicators.
22. HMPPS should conduct an annual audit of the supply chain should conduct (or commission) an annual audit of the supply chain to assess the involvement of any organisations funded by CRCs and the NPS. The audit should collate anonymised feedback, assessing their experiences and look for good practice to share as well as poor practice to learn from. The audit's findings should be made public.
 23. The Ministry of Justice and Her Majesty's Prison and Probation Service should work with Clinks, CRC owners, the NPS, and prisons to develop approaches to engage more voluntary organisations. These approaches should be tested in local areas and evaluated with a view to scaling them across England and Wales.
 24. One single probation service to operate in Wales
 25. Tendering for additional services following Integration of CRC and NPS to be co-produced with specialist third sector partners, to avoid competition amongst voluntary sector organisations and maximise the scope for innovation and sustainable delivery
 26. Construction of small secure units for serious offenders who cannot be managed in the community
 27. Appoint a Ministerial lead to ensure strong, effective, accountable leadership across Welsh Government departments, to deliver effective early intervention, support, protection and prevention.

1: What steps could we take to improve the continuity of supervision throughout an offender's sentence?

Welsh Women's Aid advocates that continual supervision throughout a sentence should be a requirement, including face to face supervision at the highest level for domestic and sexual violence offenders, we argue that this should be sufficiently resourced to ensure its quality and regularity is monitored. Welsh Women's Aid would recommend that the National Standards for the Management of Offenders and service level agreements with NPS and CRCs must specify the nature and frequency of contact with offenders. Currently this is lacking from the national standards and service level agreements meaning offenders of domestic and sexual violence may not be sufficiently supervised, putting survivors and others at risk.

We are concerned that since the privatisation of the Probation Service, there has been a rise in the number of serious crimes committed by offenders under supervision in the community, including those charged with serious crimes, such as rape or murder. It is concerning that many offenders are reporting to CRCs via phone call rather than face to face. Figures show that before privatisation, 409 serious further offence reviews were triggered. However, the number of SFOs had increased to 517.¹

¹ <https://www.theguardian.com/society/2017/aug/02/increase-serious-crimes-offenders-probation-figures-show-plaid-cymru>



4. Post-sentence supervision arrangements to improve rehabilitative outcomes

Welsh Women's Aid believes it is essential that any arrangements for domestic abuse offenders should incorporate requirements to attend a perpetrator programme accredited by Respect². The accreditation ensures programmes working with perpetrators are safe, effective and accountable and are based on evidence of what works effectively when tackling the root cause of domestic abuse. Crucially, these programmes have the safety of the survivor at their core. Perpetrator programmes should be easily accessible and within reasonable travel distance of their home.

For women offenders post sentence, it is vital they are supported to access well-resourced local women's services/centres to meet their varied and complex support needs. These centres should also be easily accessible and within reasonable travel distance of their home.

5. Improve pre-sentence advice

Welsh Women's Aid is clear a reversal of court closures and the implementation of 'speedy justice' will provide more accessible justice options and more time for probation officers to carry out, write up and file an assessment in collaboration with other experts where needed.

We call for assessments at court and pre-sentence reports to include both relevant details of domestic abuse and sexual violence perpetrated by the offender as well as experiences of abuse an offender may have experienced. Specialist services in the third sector should be resourced and supported to contribute to assessments and pre-sentence advice provided by probation. This will enable histories of domestic abuse or sexual violence to be identified and the support needs to be considered by the court and in sentencing requirements.

7. How else might we strengthen confidence in community sentences?

Welsh Women's Aid is clear that it is not enough to 'offer' monthly face to face contact as the consultation suggests; these may not be taken up or be cancelled. There needs to be a robust system in place to monitor sentencing requirements – particularly for domestic abuse and sexual violence offenders. The evidence is clear that too many Domestic Homicide Reviews (DHRs) have noted that offenders were not effectively supervised and went on to kill women whilst on probation. This has also been reflected in recent media reports:

Leroy Campbell, 57, raped and strangled Lisa Skidmore, attempted to murder her mother and then set fire to a property in Wolverhampton in 2016. A watchdog review found the probation service should have acted to protect the public from Campbell; that Campbell killed Ms Skidmore just weeks after he told probation staff he might rape again, the review found.

The effectiveness of supervision, therefore, is vital and should be subject to strict controls. It is unacceptable that offenders on probation who tell officers they are likely to commit further serious offences, are not recalled or action taken to prevent reoffending.

² <http://respect.uk.net/what-we-do/accreditation/>



Welsh Women's Aid is clear that partner agencies involved with someone on probation know what the supervision arrangements are for domestic abuse and sexual violence offenders, to ensure effective multi-agency working. Clarity is needed between agencies on who is the lead professional and who has responsibility for compliance, where supervision orders require other agencies to deliver aspects of the order.

The Home Office review of DHRs³ found, for example, that six DHRs specifically noted that lack of information sharing was in direct contravention of agency policy;

"The review has highlighted that following a verbal argument between [the perpetrator] and his ex-partner...probation should have been notified of this call out as [the perpetrator] was on an Order for an offence of violence against [ex-partner], and probation had submitted the relevant documentation to notify the police of this."

The same review noted four cases, where there was lack of clarity over agency roles or lead profession, contributed to a domestic homicide: *"There [was] ... lack of understanding about the roles of [mental health provision] and [probation] in relation to the assessment and administration of a community order with a mental health requirement."*

In terms of community sentences for women offenders; in an open letter to the Justice Secretary, a number of women's and prison reform organisations highlighted that women's community services have been proven to be effective in preventing women going into prison and providing better outcomes for those who do. But funding pressures have resulted in many services struggling with some closing completely.⁴

Welsh Women's Aid would urge government to consider the impact on children of imprisoned mothers. 17,000 children experience their mum being sent to prison. Yet 83% of women sentenced to prison had committed a non-violent crime and 62% were serving a sentence of six months or less⁵. Outcomes for children whose mother goes to prison can also be poor, with low school attainment, poor mental health and experiences of bullying⁶. The UK Government Female Offender Strategy itself highlights that prosecutions against women are far more likely to be low-level, non-violent offences but that contact with the criminal justice system results in negative outcomes for families. Given a higher proportion of children live with their mother prior to imprisonment. It has a greater impact on the living arrangements of dependent children. In Wales, it is even more impactful as there are no women's prisons, so the distance between families is greater. We do not support a women's prison in Wales but are clear that community based sentences will have better outcomes for both mother and children, providing the opportunity to continue to or engage in employment and remain in their own home.

Welsh Women's Aid welcomes the plans to trial residential women's centres, but is clear these must be well resourced and fully-accessible and backs the call from the Advisory Board for female offenders that more investment is needed to make it a success. Particularly as currently gender-informed

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575232/HO-Domestic-Homicide-Review-Analysis-161206.pdf

⁴ <https://weareagenda.org/open-letter-to-justice-secretary/>

⁵ Op Cit – Prison Reform Trust

⁶ ibid



community services to support women are patchy⁷. This is compounded by the lack of other resources, for example lack of available, appropriate accommodation, as *Exploring the impact of the Housing (Wales) Act 2014 on women involved in the Criminal Justice System* identified; 'A lack of affordable housing is identified...as a contributory factor in homelessness'⁸. The Government Female Offender Strategy notes cases of women held on remand because of a lack of appropriate accommodation rather than the risk she poses. Improved community interventions for women must therefore be linked to the chronic shortage of housing and move-on options.

Women's centres should be supported to work alongside probation to develop effective community support to complement sentencing requirements and to maximise the opportunity for desistance in future offending. Finally, court staff and magistrates should be fully informed of the community options available to work towards a reduction of women in custody.

8(a). How can we ensure that the particular needs and vulnerabilities of different cohorts of offenders (e.g. female, BAME, young adult offenders) are better met by probation?

8(b). Do you have evidence to support your proposals? If yes, please give details:

The Prison Reform Trust highlights that the UK still has one of the highest rates of women's imprisonment in Western Europe, 'women have been described as 'correctional afterthoughts' who are overlooked in policy, planning, and services'⁹. The majority of women offenders should not be criminalised in the first place. Welsh Women's Aid is concerned that describing women's experiences of poverty, mental health support needs, experiences of child sexual abuse, sexual violence or domestic abuse, as "pathways to offending" further labels, blames and judges women; these should be understood as breaches of women's human rights. All women should have unconditional access to support services they need to recover from trauma, without having to also experience the trauma of arrests and court sanctions to facilitate their access to support. Without this investment into specialist services that are freely available *before* any offending may occur (e.g. access to support for those impacted by child sexual abuse, access to support for young women experiencing coercive control in their teenage relationships), we face an increase in sentencing and punishment, which increases women's criminalisation as a result of low level offending rather than reducing the harms they experience from the afore mentioned.

Welsh Women's Aid is clear there must be an acceptable level that Probation needs to deliver to ensure quality of service. Additionally, a sustainable level of funding is essential to ensure that service can be delivered effectively. This must include an assessment of the services required to meet the needs of people with protected characteristics.

Meeting the needs of vulnerable people across protected characteristics is not a desirable outcome, this is a legally-enforceable critical priority. The Offender Rehabilitation Act 2014 places a statutory duty on the Secretary of State for Justice to ensure that arrangements for the supervision or

⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719819/female-offender-strategy.pdf

⁸ <http://www.thegriffinsociety.org/exploring-impact-housing-wales-act-2014-women-involved-criminal-justice-system>

⁹ <http://www.prisonreformtrust.org.uk/portals/0/documents/what%20about%20me.pdf>



rehabilitation of offenders identify any specific provision for women, requiring active steps by all agencies to deliver gender informed services for women in contact with the criminal justice system.

The necessary, evidence-based response to women offenders was set out in the Corston Report ten years ago, We would encourage any reform of probation delivery ensures these recommendations are implemented fully across England and Wales. The Corston Report in particular noted that Black and minority ethnic (BME) women are *“further disadvantaged by racial discrimination, stigma, isolation, cultural differences, language barriers and lack of employment skills,”* and asserted that more effort was needed to promote diversity within women’s services, with additional support and interventions.”¹⁰

Additionally, Welsh Women’s Aid is aware that some BME women affected by violence against women and girls (VAWG) may be coerced into offending in distinct ways, including trafficked women and women with an insecure immigration status. Welsh Women’s Aid is clear strategies to support women involved in the criminal justice system must include organisations specifically working with BME female offenders. For example those operating within Imkaan’s Quality Service Standards for working with BME women and girls¹¹ and Welsh Women’s Aid National Quality Service Standards for specialist VAWG services in Wales¹².

No person should suffer discrimination or disadvantage as a result of sex, ethnicity, religion, sexuality, disability, foreign national status or literacy/language barriers. Probation and the wider criminal justice services therefore need a better understanding of how they contribute to institutional discrimination experienced by BME women, who face significant discrimination and barriers to accessing support.

A summary of evidence for this has been summarised by the Prison Reform Trust in their Wales Justice Commission submission¹³. BME women are over-represented in prison, making up 19% of the prison population compared to 14% of the general women’s population (MOJ 2016).

Additionally, Black British women make up 10% of the women’s prison population, however are only 3% of the general UK population¹⁴. The recent Lammy Review found that Black women are twice as likely as white women to receive a custodial sentence in the Crown Court for drug offences, and Asian and other minority ethnic women are over 40% more likely than white women to be convicted at magistrates’ court (MOJ 2016). Welsh Women’s Aid welcomes the reduction in girls receiving convictions, however notes the disparity in these reductions based on ethnicity. Since 2006 there has been a drop of 81% in conviction rates for white girls, compared with a 65% drop for black girls and a 40% drop for Asian girls and the number of black and Asian girls receiving convictions rose in 2016.

Probation and its partner agencies should identify at an early stage women’s needs and circumstances and respond appropriately. These may include young women in care; those with caring

¹⁰<http://webarchive.nationalarchives.gov.uk/20130206102659/http://www.justice.gov.uk/publications/docs/corston-report-march-2007.pdf>

¹¹ file:///C:/Users/EliCrouch-Puzey/Downloads/Safe-Minimum-Practice-Standards-Final-2016.pdf

¹² <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/12/Introduction-to-WWA-National-Quality-Standards-Sept-2016.pdf>

¹³ <http://www.prisonreformtrust.org.uk/Portals/0/Documents/Consultation%20responses/Wales%20Justice%20Commission%20PRT%20submission.pdf>

¹⁴ <http://www.prisonreformtrust.org.uk/Portals/0/Documents/Counted%20Out.pdf>



responsibilities; women with mental health and substance misuse needs; women who have experienced violence, abuse and coercion, exploitation, trafficking or modern slavery; poverty and who have housing needs. This needs assessment should guide decision making about diversion, arrest, charge, bail, conviction and sentencing.

Welsh Women's Aid is clear that many women engaged in the CJS can be victims themselves, often of forms of violence against women and girls. The Prison Reform Trust claims many women in prison have been victims of much more serious offences than the ones they are accused of committing. It found, more than half (53%) report having experienced emotional, physical or sexual abuse as a child compared to 27% of men. With 57% of women report having been victims of domestic abuse¹⁵.

Clearly more needs to be done at an early intervention stage, as well as cross-agency working between specialist VAWG services and probation services, to support women who have experienced trauma and abuse before they offend and divert them from custodial sentences. If they have offended then it is vital to ensure support is gender informed and recognises the nuances of coercive control and other forms of VAWG that can lead to offending.

We support Clinks' recommendation that there is a need to collect and publish feedback from service users. A mechanism is needed to gather views from a representative sample of probation service users and their families to assess the state of services they receive. We recommend this analysis should be published and used to improve services.

Welsh Women's Aid welcomes the commitment in the National Police Chief's Council (NPCC) to assess the needs of women who come into contact with the police. It is particularly promising that they may be able to divert women from the CJS or support women to complete a community order. It appears there is commitment to driving this forward across England and Wales. Welsh Women's Aid will be monitoring this closely.¹⁶ However, it is vital that investment is made into women's centres and support services for women to be diverted into. Specialist services has faced years of under-funding and this must be reversed if any progress is to be made in supporting those most vulnerable and those who have higher support needs. Specialist services must be resourced to provide earlier support and help, to reduce the numbers of women reaching crisis point.

The patchy availability of support on release from prison, including suitable housing, health and social care services and welfare benefits, leaves women even more vulnerable to abuse and offending. Welsh Women's Aid welcomes the commitment in the female offender strategy funding for community provision for female offenders at risk of offending who have or are living with domestic abuse, but is clear the £5 million over two years allocated is not enough. As stated, we support the third sector members of the MoJ's Advisory Board on Female Offenders recent request to the Secretary of State for Justice, that at least £20 million of additional funds should be allocated to the 'community provision' promised in the strategy.

It is not enough to prevent imprisonment of women as a solution because women will continue to face a cycle of community punishment and crisis; more priority must instead be given to investment

¹⁵ http://www.prisonreformtrust.org.uk/Portals/0/Documents/Women/why%20women_final.pdf

¹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721190/police-guidance-on-working-with-vulnerable-women-web.pdf



into women's centres and third sector specialist VAWG services that are available at the first point a need for support is identified. All women must have unconditional access to the resources and the women-centred support services they need to survive, thrive and flourish.

9. How could future resettlement services better meet the needs of offenders serving short custodial sentences?

Welsh Women's Aid advocates for resettlement services to be gender informed, working within a multi-agency setting in partnership with specialist VAWG services. We are concerned that women who have experienced forms of VAWG prior to a custodial sentence are at further risk on release, particularly if there is no support to find alternative accommodation away from perpetrators.

Welsh Women's Aid is concerned about findings in the *Exploring the Impact of the Housing (Wales) Act 2014 on women involved in the CJS* about the lack of joined up working between prisons and local authority housing options teams. The report highlights that often HO teams are not given enough notice about women leaving prison. The National Offender Strategy, the report claims, states local authorities should be working with women 12 weeks prior to release. It notes of particular concern for Welsh women is that women's prisons are in England so visits from the local authority are not always possible.¹⁷

Homelessness on release from prison is a key risk factor for any prisoner, but there are particular issues for women. Women are more likely than men to be single-parents with tenancy agreements in their own name, which could be lost due to rent-arrears during their time in prison. Secondly, prison leavers are no longer automatically considered priority need in Wales. Therefore probation services must consider the impact of the loss of property, especially if this is a family home, and how this may impact on children being reunited with their mother. 'A loss of property and possessions can make the early stages of release difficult: it can prevent women from regaining their children from care, act as a barrier against registering for benefits and make it harder to find a job'.¹⁸ The report goes on to highlight that not having accommodation on release seems to result in some women 'actively reoffending in order to have a roof over their head, thus the revolving door continues'¹⁹.

We advocate for the development of local provider networks, as a minimum requirement, to nurture local partnerships and bring together key partner organisations to inform the design and delivery of resettlement services for people under probation supervision.

Community orders for women with dependent children should consider childcare needs of mothers and whether a lack of this provision can make it difficult for women to attend probation meetings or other appointments linked to their order.

We would back calls from the Prison Reform Trust for the abolition of mandatory post-custody supervision for short sentenced women, which has been particularly disastrous for women, resulting in a very high rate of women's recall to prison. Instead the offer of support should be made sufficiently attractive and tailored to women's needs.

¹⁷ Op Cit - Exploring the Impact of the Housing (Wales) Act 2014 on women involved in the CJS

¹⁸ Op Cit Exploring the Impact of the Housing (Wales) Act 2014 on women involved in the CJS

¹⁹ ibid



The Revolving Doors Agency found 3 out of 4 members of the public think people with drug or alcohol addictions belong in treatment programmes instead of custody. Yet 70% of women require clinical detox on arrival at prison.²⁰ Clearly there is a sea-change among public opinion about what custody should look like. Welsh Women's Aid therefore urges UK Government to carry through on its commitment to reforming how women in the CJS are dealt with and evidence the benefits of community sentences, particularly for non-violent crimes that have short sentences. Prison Reform Trust, for example, has found that community options have had better outcomes for women, but are underused and under resourced²¹. We would therefore advocate for short custodial sentences for women to be abolished and replaced with community based support.

10. Which skills, training or competencies do you think are essential for responsible officers authorised to deliver probation services, and how do you think these differ depending on the types of offenders staff are working with?

Welsh Women's Aid is very concerned about the decision in the Transforming Rehabilitation reforms not to regulate training and qualifications, which we feel threatens to destroy the consistency of professional training for Probation Officers and Probation Services Officers. We, therefore, welcome the suggested reversal of this. The importance of degree-level qualifications should be reinforced, to be comparable with other justice system professionals, with training and qualifications regulated with clear roles and agreed definitions.

Welsh Women's Aid is clear that probation services must deliver gender and trauma informed responses to women involved in the CJS. Probation services, therefore, need to be able to recognise the trauma experienced by many women involved in the CJS. We would call for Probation officers to be required to have attained competencies in the identification of and response to domestic abuse/coercive controlling behaviour, sexual violence and other forms of VAWG.

We know that some women are reluctant to involve the police when they have experienced violence and abuse. Women have reported poor attitudes and a lack of being believed in the approach from first response officers²². Welsh Women's Aid is concerned that women on probation who are experiencing victimisation from an abusive partner or family member may be even more reluctant to involve the police, due to their past involvement. We would urge probation services and the police to work together to reassure women that they should still be afforded protection despite a criminal record.

Specialist services should be supported and enabled to be a genuine part of the development and management of an appropriate, aligned learning and training framework for probation services. They should also be able to access funding for training and assessment standards which their practitioner staff could achieve, if they deliver offender support services or interventions. This would extend professional training and qualifications to the third sector.

²⁰ <http://www.revolving-doors.org.uk/blog/ministry-justice-female-offender-strategy>

²¹ http://www.prisonreformtrust.org.uk/Portals/0/Documents/Women/why%20women_final.pdf

²² <https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/2014/04/improving-the-police-response-to-domestic-abuse.pdf>



Finally, any establishment of a Professional Register must include any contracted private providers of Probation Services, offender managers in prison services and youth offending professionals to ensure they also meet the points made above.

14. Better engagement of voluntary sector providers

Welsh Women's Aid is concerned about the lack of involvement of the VAWG sector in supply chains and in supporting rehabilitation of offenders. We know that changes to probation, under the Transforming Rehabilitation reforms, have negatively impacted the quality of probation services and despite the rhetoric that surrounded it which promised a central role for third sector services, we know from research that services are significantly under-represented, under pressure and under-resourced in the current delivery of probation²³. We also know that charities in supply chains have had to adapt services or subsidise them with other charitable funds, undermining their own sustainability.

Research has noted that there is currently very little Welsh third sector involvement in the Welsh CRC's supply chain and any new model will need to address this in order to ensure services are appropriately localised (see below).

We welcome that the Ministry of Justice has recognised the value of co-designing commissioning and partnership working arrangements. However the detail is lacking, so we urge any reforms to ensure VAWG services are involved in creating new engagement mechanisms from the outset.

We also support recent CLINKS recommendations that;

- CRCs and the NPS should publish, quarterly, full details of their supply chains, including: the names and company/charity numbers of tier two and three providers; the amount of funding passed down to sub-contractors; a summary of the service being provided; and where appropriate the contribution that these organisations have made to Key Performance Indicators.
- HMPPS should conduct an annual audit of the supply chain should conduct (or commission) an annual audit of the supply chain to assess the involvement of any organisations funded by CRCs and the NPS. The audit should collate anonymised feedback, assessing their experiences and look for good practice to share as well as poor practice to learn from. The audit's findings should be made public.
- The Ministry of Justice and Her Majesty's Prison and Probation Service should work with Clinks, CRC owners, the NPS, and prisons to develop approaches to engage more third sector organisations. These approaches should be tested in local areas and evaluated with a view to scaling them across England and Wales.

16. How can we ensure that arrangements for commissioning rehabilitation and resettlement services in Wales involve key partners, complement existing arrangements and reflect providers' skills and capabilities?

We support the need for one single probation service in Wales (as was in place prior to the recent reforms of probation), which we anticipate will be more efficient and effective as a delivery option.

²³ https://www.clinks.org/sites/default/files/basic/files-downloads/clinks_track-tr_under_final-web.pdf



Research has noted that there is currently very little Welsh third sector involvement in the Welsh CRC's supply chain and any new model will need to address this in order to ensure services are appropriately localised. It is vital that umbrella bodies (such as Welsh Women's Aid that supports national and local specialist VAWG services) and other third sector bodies that represent and support smaller organisations, are engaged meaningfully by probation services. We, therefore, call for inclusion in these conversations.

Integrating the functions of the CRC and NPS into a single organisation with responsibility for all offenders, will mean that additional services that support rehabilitation and resettlement will then be put out to tenders. Welsh Women's Aid would recommend that additional services are co-produced with specialist third sector partners, to avoid competition amongst third sector organisations and maximise the scope for innovation and sustainable delivery.

In partnership with Safer Wales, Welsh Women's Aid developed a number of recommendations to support women's support needs, these included;

- *Existing good practice in Wales involves a network of women-centred provision, including for example:*
 - Safer Wales women's services;
 - Welsh Women's Aid network of specialist services providers that support women and children, including 'one stop shops' for survivors of domestic abuse, sexual violence services and specialist support for Black and minority women;
 - Women's centres in Wales (e.g. North Wales Women's Centre, Cardiff Women's Aid Women's Centre).
- Wales provides an ideal opportunity to develop locally-based residential women's units and women's community centres.
- The development of small secure units, for the very few women whose offending is so serious that there can be no option but imprisonment, should be accompanied for the vast majority of women, by constructive community sentences.
- Ensure sustainable women-centred services are provided across Wales that support women in the community and prevent or divert women from the justice system.
- Resource and capacity build existing national networks of women-centred women's services - supported by government drawing on cross departmental budgets on five year funding cycles - so they can support women in conflict with the criminal justice system.
- Appoint a Ministerial lead to ensure strong, effective, accountable leadership across Welsh Government departments, to deliver effective early intervention, support, protection and prevention.

The above feedback applies to any new model in Wales. See above for third sector engagement comments too.
