



Baroness Uddin and Baroness Eaton DBE DL

House of Lords
London
SW1A 0PW

MoJ ref: 71622

12 August 2019

Dear Manzila and Margaret,

THE NEEDS OF WOMEN IN THE CRIMINAL JUSTICE SYSTEM

Thank you for your interest in female offenders and the important points you raised in the debate on the needs of women in the criminal justice system on 25 July.

During the debate, a few points arose that merit further clarification and I agreed to write to you on these.

Eden House

Following the split of probation services through the Transforming Rehabilitation programme, there was a rationalisation of property which was surplus to National Probation Service requirements. Eden House was still being used by the local Community Rehabilitation Company (CRC) and the sale was made subject to the existing CRC lease, which means in practice that the CRC will continue to have use of the building until 2022.

Safety at HMP Downview

Improving our response to suicide, self-harm and violence are priorities the Ministry of Justice and Her Majesty's Prison and Probation Service are taking very seriously. A variety of national initiatives have been developed to ensure we are providing a high-quality service to those in our care, and we will continue to review and develop these as outlined below.

- Improved *Introduction to Suicide and Self-Harm Prevention* training for new and existing staff, including a module on mental health awareness training, to increase the confidence and skills of staff in supporting prisoners in distress.
- As part of NHS England's 10-point plan for the criminal justice system, the current *Prison Transfer and Remission Guidance*, published by the Department of Health in 2011, is being reviewed. Two separate documents are being developed to replace it, one for prisons and one for immigration removal centres. A particular focus is on ensuring that the timescales within the guidance take into account clinical urgency and need.

- The Government is considering the recommendations of the independent MHA Review (which includes recommendations relating to transfers from prison to secure mental health services) in detail, and will publish a White Paper later in the year, setting out its response.
- We have refreshed our partnership with the Samaritans by awarding a grant of £500,000 a year for three years. This will ensure the excellent Listeners Scheme continues in our prisons, which helps provide emotional peer support to those at risk of suicide and self-harm.
- We are updating the Assessment Care in Custody and Teamwork (ACCT) process, the system by which those at risk of suicide and self-harm are supported. The new version will be rolled out in early 2020, and will focus on encouraging family involvement, where appropriate, as well ensuring that management of individual's is done by a multi-disciplinary team.

As you know, there have been three self-inflicted deaths at HMP Downview since it reopened in May 2016. Our thoughts remain with the family and friends of those involved. These incidents occurred in April 2017, April 2018 and August 2018 and were not linked. Prison and Probation Ombudsman (PPO) reports have been provided to the prison for two of the cases and all recommendations have been accepted and implemented via the appropriate Action Plans.

To help improve support, and in turn prevent such tragedies occurring again, the following steps have been taken:

- The outcome of a quality assurance exercise on ACCT documents identified issues, which the prison has addressed in designing and implementing improved checks by managers, with the intention of driving up standards;
- Holding weekly multi-disciplinary Complex Case Boards to discuss those in our care, with the greatest needs;
- Engagement with other stakeholders within the establishment, and the wider estate, to underpin support for residents with healthcare services, mental health in-reach services, psychology services, and Offender Personality Disorder Pathways. This not only ensures a multi-disciplinary approach to managing self-harm, but also helps develop an understanding of the causes and drivers of violence and self-harm amongst residents;
- Engagement with the *Becoming Trauma Informed* initiative, and receiving assistance with training from HMP Send in supporting Trauma Healing delivery;
- Introduction of new case management assurance processes, to ensure consistent case management of residents on ACCTs, and to ensure we are providing appropriate support;
- Managing Challenge Support Intervention Plans (CSIPs) and ACCTs through dual harm guidance, and any other relevant support plans that are in place;
- Engagement with the National Complex Case Board to further support, identify and discuss our most challenging residents and to facilitate sharing of practices that may have been successful in other establishments; and
- Utilising *Support Through Enhanced Management (STEM)* referrals, to understand the drivers behind violence or self-harm, and engaging residents in addressing potential underlying triggers.

In addition to local actions, HMP/YOI Downview is subject to the same objective and challenging assessments of all individual prisons, and the prison system at large, undertaken by our widely respected external scrutiny bodies. These include Her Majesty's Inspectorate of Prisons, the Care Quality Commission, the Prison and Probation Ombudsman, and organisations with oversight on the quality of care provided to those in custody, such as the Independent Monitoring Board, The Ministerial Council on Deaths in Custody, and Coroner's Reports.

Reports provided by such bodies are taken seriously. To this end, we have introduced an Urgent Notification process that enables the Chief Inspector of Prisons to alert the Justice Secretary to prisons that are of particular concern. When an Urgent Notification is triggered, the role of healthcare and key health service partners are included in any required, formal response.

I also wish to make a few clarifications to my responses during the debate. I mentioned that there are 64 places available in Mother and Baby Units; there are indeed 64 places for mothers, but places for 70 babies to allow for possibility of twins.

My officials are now refining the design of future probation services that take account of the fact that many female offenders are victims of abuse with complex needs, including mental health and substance abuse. We will consider how to build on current good practice for female offenders and incorporate these principles into future delivery arrangements.

I am copying this letter to all Peers who spoke in the debate and will place a copy in the House Library.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken of Elie', written in a cursive style.

RT HON LORD KEEN OF ELIE QC