



Alex Chalk MP
Parliamentary Under-Secretary
of State for Justice

Juliet Lyon CBE
Chair: Independent Advisory Panel on Deaths in Custody
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Dear Juliet,

Thank you for your letter of 26th March, and for the insight into your 2017 report, "Preventing The deaths of Women in Prison". Your letter also raises additional matters of concern, and I welcome your constructive engagement with us as we look to address these issues. I note that you last received a detailed update of actions in response to your report in January 2020. Clearly the operational environment between that update and the present day has been challenging, with the focus on mitigating the risks presented by the pandemic.

You mention the potential increased need for emotional and practical support in the wake of Sarah Everard's tragic death, and specifically note that the IAPDC recommends expediting the introduction of the keyworker scheme in the women's estate; I am pleased to confirm that Offender Management in Custody (OMiC) - the system that introduces key work- will be rolled out across the Women's Estate from the 30th April 2021.

We have developed a bespoke offender management model which recognises the different needs of women and the challenges and opportunities within the women's estate. This will help staff and the women in our care benefit from the increased opportunity to build relationships which are essential in creating an environment which is safe and settled.

Both key work and case management time will be allocated to women based on their level of need in addition to their risk of harm. Women with the most complexity of need will receive an enhanced offender management service, with additional engagement time between Prison Offender Manager (POM) and prisoner. Prison officers will continue to work with all women and build on the excellent relationships developed within their roles as residential officers. All staff will continue to work together to share information in order to support and manage women effectively.

As you have identified, the rate of self-harm in the women's prison estate is too high, and we are determined to address this. Whilst risks, triggers and protective factors are unique for every individual in prison, evidence shows that some are more commonly experienced by women. It is therefore important that approaches to support individuals at risk of self-harm in the women's estate are tailored to what works for women. To drive this work forward you will be aware that the Women's Estate Self Harm Task Force was set up in April 2020 and I would like to thank you for your support for this important work.

Some of the key actions delivered through the task force so far include securing funding to support delivery of Support through Enhanced Management -a trauma-informed initiative to understand and manage behaviours of women with complex needs - and additional counselling provision.

The task force has driven the development of additional women-specific training to provide new officers working in the women's estate with a better understanding of these issues. Adapted training modules for Prison Offender Managers and Keyworkers working in the Women's Estate are also being developed.

To improve our understanding and inform future work, the task force has supported women-specific self-harm research which is being undertaken with Derby University. We have also appointed a Safety Analyst within the women's estate to look at the data and make better informed decisions around reasons for self-harm within the women's estate.

As you note, the introduction of Covid-19 measures have impacted many women's risks, triggers and protective factors, and there has been an increase in the rate of self-harm incidents in the women's estate. To address this, the Women's Estate Self Harm Task Force has implemented a number of measures to mitigate the impact of COVID-19 on the wellbeing of women prisoners. This includes increased pin credit allowance and access to video calling to encourage and enable connection with family, the provision of distraction packs and in-room education materials, and the introduction of general wellbeing checks for all women. Women's prisons were also prioritised for the roll-out of in-cell telephony. All closed women's prisons now have in-cell telephony, with the exception of HMP Downview where installation is currently taking place.

HMPPS is committed to building on lessons learned during the pandemic to improve our regime delivery whilst in recovery as well as when establishments reach Stage 1 of the National Framework and move beyond the high-risk period. Within this, we are keen to understand the impact of the adjustments made in response to COVID-19 on those in our care. We have taken necessary robust action to restrict regimes and save lives. We have not done this lightly and mitigated as many of the negative impacts of our COVID-19 restrictions on both prison residents and staff as best we can.

The HMPPS's objective is to "build back better" at Stage 1 and beyond. Stage 1 represents the point at which prisons have reintroduced full regimes and are operating in a state of relative stability and health with the main COVID-19 restrictions no longer in place. The goal to "build back better" rather than simply reintroduce pre-COVID regimes means striving to improve pre-COVID regime elements and incorporate any evidence-based learning from our COVID-19 response into national operational models to guide Governors in their future regime design.

In terms of our direct operational response to individuals presenting with self-harming behaviours we have now rolled-out the revised Assessment Care in Custody and Teamwork (ACCT) version 6 in the female estate and in our original pilot sites. This should provide a better framework for supporting women at risk of self-harm through a more tailored and multi-disciplinary support model that focuses on the needs of the individual. We are currently planning to roll out ACCT v6 to the male estate in July.

Improving the knowledge and skills of staff will be critical in taking this work forward and so we have rolled out revised and improved Introduction to Mental Health training for new and existing staff, and are currently working to develop a new modular safety training package which will include self-harm and suicide prevention, and enhanced mental health training module, (building on the introductory course).

We continue to work closely with Samaritans and for 2021-22 we have renewed the grant of £500k for the Listener scheme.

There have been some challenges during the pandemic period, with attrition in Listener numbers and/or infection control measures necessitating restrictions to the service, or suspensions of the scheme, in some establishments. Where this has occurred additional efforts have been made to promote the availability of the Samaritans phone service, which has seen an increase in calls from prisons, including over 11,000 calls from women's prisons in the last year.

The pandemic has also seen some innovation in the women's estate, with HMPs Send and Bronzefield facilitating phone access to Listeners using their in-cell telephony. All women's prisons except HMP Foston Hall (where an outbreak has prevented Samaritans volunteers from visiting to deliver training) currently have functioning Listener schemes, although some have lower numbers of Listeners than usual. Samaritans have recently identified a lead volunteer for the women's estate who co-ordinates the work of colleagues in the various branches supporting the prisons, and we will be working with them, and their central office team, to support each of Listener schemes in the women's estate to rebuild capacity in the coming months.

I note the concerns that you have raised about the 500 new places to be provided in the women's estate. Capacity need is predicted to rise within the women's estate and the additional capacity will include 95% single cells which is popular with women in custody as it provides privacy and safety. The new units will provide improved access for services that support the needs of women in custody including around mental health and risk of self-harm.

New open provision at a greater number of sites will provide incentive for women to progress within their establishment without the need to move far from their families and support networks and the upheaval that goes with that – most noticeably in regard to reducing the likelihood of self-harm. In line with the female offender strategy, better conditions for those women who do require custody will be delivered. New accommodation that is decent, safe and secure and supports the modernisation of the prison estate will be developed alongside parallel investment in community provision and services. If the projected increase in the women's population does not materialise then we have committed to using these places to close down existing older, less suitable accommodation in the women's estate.

Our designs for the new places are conscious of and directly informed by the lived experiences of women in custody.

I want to reassure you that we are not investing in these additional prison places at the expense of women's community services - this is not an 'either/or' approach. We are investing approximately £80 million in community drug treatment and £70 million in accommodation services that will benefit both female and male offenders, and we have invested some £7 million in women's community services in the last three years. We also announced last year that our first residential women's centre will be in Wales, which will provide a robust community alternative for women who would otherwise be at risk of a short custodial sentence. I must stress that we firmly believe custody should remain the last resort for women, but for those women who do require custody – they must be held in appropriate, decent and safe accommodation, which supports effective rehabilitation.

I am pleased that you welcome the Women's Estate Health and Social Care Review. I am determined that this review will improve health and well-being outcomes for women in prison and upon their release, reduce health inequalities and ensure equity of access to the full range of health and social care services across the Women's Estate.

Finally, thank you for your offer to come to speak to the Advisory Board on Female Offenders. I am looking forward to attending my first Board meeting today, and I will ask my officials to liaise with you about attending a meeting of the IAP at a future date. Ahead of that, I will ask my officials to arrange a meeting to discuss progress made both since your report on preventing the deaths of women in prison in 2017 and the launch of the FOS in 2018.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alex Chalk'.

ALEX CHALK MP