

Written evidence submitted by Women in Prison

Dear Dame Meg Hillier MP

RE: Supplementary evidence on improving outcomes for women in the criminal justice system

I would like to thank the Public Accounts Committee for the opportunity to provide oral evidence for the inquiry on improving outcomes for women in the criminal justice system on Wednesday 2nd February. I listened to the subsequent oral evidence hearing with Antonia Romeo (Permanent Secretary of the Ministry of Justice), Jo Farrar (Second Permanent Secretary of the Ministry of Justice, and Chief Executive of Her Majesty's Prison and Probation Service), and Jerome Glass, (Director General, Policy and Strategy Group, at the Ministry of Justice) with interest and I would like to provide supplementary evidence related to some of the specific points they raised.

Transparency on strategy commitments

In the oral evidence it was highlighted by Antonia Romeo that of the 66 commitments in the strategy, 29 have been completed, 15 "will be completed" and two are red. When asked by the Committee if this information can be published, Jerome Glass stated that the Ministry of Justice had shared their "progress update" with the Advisory Board for Female Offenders (ABFO) in November 2021.

As a member of the ABFO since the group's inception, I do not recall that we were provided with a RAG rating on the progress with implementing the 66 commitments identified by the Ministry of Justice in November 2021. The ABFO are still uninformed of what the 66 commitments in the strategy are. As has been previously mentioned, Prison Reform Trust's own analysis of the strategy identified 65 potential commitments, many of which were vaguely worded.

In the materials for the November 2021 meeting there was what appears to be a colour coded rating of 23 "intervention level measures" which included, for example, work to improve the use of Out of Court Disposals, the creation and support of Whole Systems Approaches and a pilot of residential women's centres. The measurement of these commitments focused specifically on the availability of "national data, intervention level data and planned evaluations."

We would suggest that the Committee asks the Ministry of Justice to share the resources provided at the April 2021 and November 2021 meetings with the Advisory Board for Female Offenders, so the Committee can analyse the materials shared with board members.

We welcome the commitment by Antonia Romeo that the full RAG ratings of all 66 commitments will be published, and ask that these are made publicly available at the earliest opportunity.

Implementation of the strategy 'quite strong'

In the evidence, Jerome Glass made the claim that implementation on the strategy had "overall been quite strong." We were disappointed to hear this claim and we believe this to be inaccurate.

The Ministry of Justice's implementation of the strategy has not only been met by "concerns from the sector," as Jerome Glass mentioned, but also the National Audit Office which identified highly critical findings, including that:

- The Ministry of Justice did not set performance measures to assess its progress and therefore whilst "some progress" had been made "it was not possible to make a full assessment of progress."
- The Ministry of Justice delayed some workstreams and has not implemented others because of insufficient resources.
- The Ministry of Justice does not have a good understanding of whether it is making progress towards its wider aims.

We would also suggest that the Ministry of Justice was itself aware of the issues in analysing progress on the strategy. Resources from the Ministry of Justice for the November 2021 ABFO meeting included a PDF on Data and Performance which acknowledged that they were "working through numerous challenges in understanding performance" which included a lack of specific targets in the strategy.

Accountability on performance indicators, metrics and outcomes

In the oral evidence, Antonia Romeo explained that she wanted to talk about metrics, instead of targets. We share the concern raised by the Committee that the Concordat, "lists data, not performance measures" and we have observed this same trend in the approach to the strategy in materials provided to the ABFO.

Focusing on metrics rather than targets not only makes it challenging to determine progress with achieving the aims of the strategy but significantly weakens accountability mechanisms on the Ministry of Justice for its delivery, and accountability of other government departments.

We echo the National Audit Office's finding that without setting out clearly its ambitions, the Ministry of Justice cannot cost how much will be needed to meet them, therefore impacting performance, the department's ability to make evidence-based decisions and potential to secure money from the Treasury. It is essential that the implementation of the strategy is based on measurable outcomes to ensure effective programme delivery and that the "one-year on" progress report on the Concordat, which is currently overdue, provides clear performance measures.

We hope this additional evidence is of assistance to the Committee and we are grateful for your important work scrutinising this issue.

February 2022

