

## Written evidence submitted by the Independent Advisory Panel on Deaths in Custody

### Introduction

1. The role of the Independent Advisory Panel on Deaths in Custody (IAPDC) is to advise Ministers and officials on how they can meet their human rights obligations, prevent deaths and keep those under the care of the state safe.
2. The IAPDC welcomes the opportunity to submit evidence to the Committee's call for evidence on improving outcomes for women in prisons. For our response we have provided answers relevant to our single and central purpose of preventing all deaths, natural and self-inflicted, in custody.
3. In the four years leading up to September 2021, 33 women have died in prison. 11 (33%) of these deaths have been recorded as being self-inflicted. There were 12,140 self-harm incidents recorded in the 12 months to June 2021 in the female estate, constituting a 2% increase (versus a 16% decline in the male estate). The rate of self-harm incidents per 1,000 prisoners decreased by 13% in the male estate but increased by 16% in the female estate. Women make up less than 7% of the overall prison population but, in the 12 months to June 2021, carried out 27% of all recorded self-harm incidents.<sup>1</sup>
4. In response to a rise of self-inflicted deaths in women's prisons in 2016, the IAPDC published a report in 2017 drawing on a major information gathering exercise on preventing the deaths of women in prison<sup>2</sup>. This involved gathering input from key stakeholders – including members of the Ministerial Council on Deaths in Custody, the Advisory Board on Female Offenders and IAPDC stakeholders – and consulting over 60 women in custody, including those acting as Samaritan Listeners. This evidence and IAPDC recommendations were presented to – and accepted by – Ministers and a commitment given in the Ministry of Justice's Female Offender Strategy to 'implement them alongside this strategy'<sup>3</sup>. Because of this commitment, we have included the recommendations as an annex to this submission.
5. The IAPDC continues to monitor implementation and to play an active role in providing expert advice to ministers, officials and prison staff on effective alternatives to custody as well as measures that can be taken to ensure the safety of women in prison. In recent months this has included:

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<sup>1</sup> HMPPS Safety in Custody Statistics. Available at: [Safety in custody: quarterly update to June 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/safety-in-custody-quarterly-update-to-june-2021). [Accessed on 25/01/2022]

<sup>2</sup> IAPDC, Preventing the Deaths of Women in Prison – initial results of a rapid information gathering exercise by the Independent Advisory Panel on Deaths in Custody, March 2017. Available at: [IAP+rapid+evidence+collection+v0.3.pdf \(squarespace.com\)](https://www.squarespace.com/files/2017/03/IAP-rapid-evidence-collection-v0.3.pdf). [Accessed on: 25/01/2022]

<sup>3</sup> Response from the Prisons Minister on the IAPDC Women's Report (May 2021). Available at: <https://static1.squarespace.com/static/5c5ae65ed86cc93b6c1e19a3/t/60be32c1a77eea26e93dc39e/1623077570101/ADR86648+Juliet+Lyon.pdf> [Accessed on 25/01/2022]

- Supporting HMPPS to establish an independent reference group chaired by Lord Bradley to provide advice and challenge and the voice and views of former prisoners to its taskforce on reducing self-harm.
  - Presenting at the launch of an All-Party Parliamentary Group on Women in the Penal System inquiry into the impact of imprisonment on women's health and well-being.
  - Hosting an online seminar for HMPPS and MoJ staff in February 2021 on self-harm, which covered rising self-harm rates in the female estate and treatment interventions.
6. This response draws from a June 2021 submission to the Justice Select Committee's call for evidence on women in prisons<sup>4</sup>, exploring what progress has made since the publication of the Female Offender Strategy, offering alternatives to custodial sentences, factors leading to self-harm and how to prevent it, understanding whether the custodial estate offers a trauma-informed environment for women, and maintaining family ties in prison.
  7. More widely, the May 2021 review by the Prison Reform Trust suggested that the Government had only fully implemented 31 of the 65 recommendations made in the Female Offender Strategy, with most promises remaining unachieved or partially achieved three years later<sup>5</sup>. Recently, the National Audit's Office review of the commitments made in the Female Offender Strategy found that the MoJ allocated limited funding and resources to implement the strategy, with no goals or targets set to carry out recommendations<sup>6</sup>.
  8. The Female Offenders Strategy<sup>7</sup> outlined three strategic priorities: 1) fewer women in custody (especially on short-term sentences) and a greater proportion of women managed in the community; 2) better conditions for those in custody; and 3) fewer women coming into the criminal justice system. This response will analyse progress made against these central objectives, and whether the Department is on track to meet them and achieve the benefits they lay out.

### **Fewer women coming into the criminal justice system**

9. The central aim of the strategy was to 'reduce female prison places' and when announced, was widely endorsed by the broader voluntary sector and those that work with women in and released from prison.
10. There were 3,196 women prisoners in total in 2021, compared to 3,846 in 2018, equating to a decline of 17% since the strategy was published. Since 2020, the female prison population has declined by just 1.8%<sup>8</sup>. Given the ambitions expressed in the strategy and its preparedness to build on the Corston review<sup>9</sup>, which emphasised the need for

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<sup>4</sup> Independent Advisory Panel on Deaths in Custody, IAPDC submission to the Justice Select Committee call for evidence on women in prisons, June 2021. Available at: [IAPDC+JSC+-+Women+in+prison+-+FINAL.pdf \(squarespace.com\)](#) [Accessed on 25/01/2022]

<sup>5</sup> Prison Reform Trust, 'The Government has met less than half of Female Offender Strategy commitments nearly three years on, April 2021. Available at: [Prison Reform Trust > Press & Policy > News](#) [Accessed on 25/01/2022]

<sup>6</sup> National Audit Office, Improving outcomes for women in the criminal justice system, January 2022, Available at: [Improving outcomes for women in the criminal justice system \(nao.org.uk\)](#) [Accessed on 25/01/2022]

<sup>7</sup> Ministry of Justice, 'Female Offender Strategy', June 2018. Available at: [Female Offender Strategy \(publishing.service.gov.uk\)](#). [Accessed on 25/01/2022]

<sup>8</sup> Ministry of Justice, 'Prison Population data' December 2021. Available at Prison population figures: [Prison population figures: 2021 - GOV.UK \(www.gov.uk\)](#). [Accessed on 25/01/2022]

“radically different, visibly-led, strategic, proportionate, holistic, woman-centred, integrated approach” for women in the criminal justice system, this reduction in numbers is pitifully small.

11. The MoJ’s announcement in January 2021 to construct an additional 500 new prison places for women<sup>10</sup> continues to disappoint the IAPDC, a number of members of the Ministerial Board on Deaths in Custody, the Prison Governor’s Association, and much of the wider voluntary sector working with women in prison.
12. This plan risks misdirecting scarce resources, threatens the previously announced development of a network of Women’s Centres, and distracts from the government’s agreed focus on reducing the numbers of women in custody and its commitment to wider, cross-departmental preventative measures as well as a promise to shift emphasis away from custody to the community<sup>11</sup>.
13. A better approach would be to analyse and apply the drivers which led to an over 70% reduction in child imprisonment – a comparable group numerically and in terms of vulnerability, unmet need and risk.
14. Recent projections from the MoJ suggest that the female prison population is set to rise to 4,500 by September 2026<sup>12</sup>. To our knowledge, no serious attempt has been made to challenge these projections based largely on a planned rise in police numbers.
15. Work with the Home Office and the police to expand the use of street triage and with the Department of Health and Social Care and the NHS on a health-led response to women in difficulty could offset the projected rise in the number of women entering custody. It is worth noting that the recent dip in prisoner numbers is more likely to be down to the restricted use of courts during the pandemic rather than any policy or sentencing change.
16. The recovery period from COVID-19 presents an opportunity to revisit and deliver on longstanding commitments to develop preventative work and sound alternatives to custody for vulnerable women. Liaison and Diversion services and Community Sentence Treatment requirements have significant potential to reduce the number of women in custody (see below).

### **Fewer women in custody (especially on short-term sentences) and a greater proportion of women managed in the community**

#### *Community treatment order requirements*

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<sup>9</sup> Baroness Jean Corston, The Corston Report, 2007, Available at: [\[ARCHIVED CONTENT\]](#) ([nationalarchives.gov.uk](https://nationalarchives.gov.uk)), Accessed [26/01/2022]

<sup>10</sup> Ministry of Justice, ‘Extra funding for organisations which steer women away from crime’, January 2021. Available at: <https://www.gov.uk/government/news/extra-funding-for-organisations-that-steer-women-away-from-crime>. Accessed on 25/01/2022]

<sup>11</sup> Ministry of Justice, ‘Female Offender Strategy’, June 2018. Available at: [Female Offender Strategy](#) ([publishing.service.gov.uk](https://publishing.service.gov.uk)) [Accessed on 25/01/2022]

<sup>12</sup> Ministry of Justice Prison Population Projections 2020 – 2026, Available at: [Prison Population Projections 2020 to 2026, England and Wales](#) ([publishing.service.gov.uk](https://publishing.service.gov.uk)) [Accessed on 25/01/2022]

17. The strategy highlighted the use of CSTRs as a route to direct women away from custodial settings, citing their links to reductions in reoffending.
18. Indeed, there is evidence to suggest that health and justice outcomes for women sent to prison are significantly worse than for those given community orders, with 55.8% of women released from prison reoffending within a year, compared to 26% of those commencing a community order<sup>13</sup>.
19. Close to six out of ten women who leave prison do so homeless. The argument in favour of robust community sentences, which can assist women in fighting addiction, gaining employment skills, receiving mental health treatment and finding safe housing for themselves and their children, is clear.
20. The continued roll-out of the Community Sentence Treatment Requirement (CSTR) programme, which provides alternatives to custody for the most vulnerable, should work in tandem with the rehabilitative nature of the Female Offender Strategy. The majority of custodial sentences for women relate to acquisitive crimes<sup>14</sup> meaning that there is a scope to develop requirements aimed at combatting addictions, getting out of debt and managing money and receiving vocational training.
21. Such requirements, if funded, can provide support for drug, alcohol or mental health concerns, yet a joint IAPDC and Magistrates Association survey of magistrates on CSTRs last year indicated considerable gaps in awareness and provision. Our survey showed clearly that magistrates were keen to have fuller, more timely information on the mental health, substance misuse, social care and support needs of defendants alongside the full range of treatment requirements, as laid down in law, at their disposal<sup>15</sup>.
22. After almost twenty years on the statute book, these sentences and the much-needed treatment options are available to comparatively few courts. In 2020, community sentences with a mental health treatment requirement constituted just 1% of all community sentences handed down by the courts<sup>16</sup>. This must be addressed, with all forms of CSTRs made available as standard across England and Wales, where health is devolved.
23. Pre-Sentence Reports (PSRs), in some cases with mental health assessments, have historically been used to inform community-based sentences. It should be questioned why the number of these reports have been allowed to drop so significantly. The total

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<sup>13</sup> Prison Reform Trust, Why Focus on reducing women's imprisonment?, April 2019. Available at: <http://www.prisonreformtrust.org.uk/Portals/0/Why%20Women%20England%20and%20Wales.pdf> [Accessed on 25/01/2022]

<sup>14</sup> Ministry of Justice, 'Statistics on Women and the Criminal Justice System, November 2020. Available at: [Statistics on Women and the Criminal Justice System \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/91222/statistics-on-women-and-the-criminal-justice-system-november-2020.pdf). [Accessed on 25/01/2022]

<sup>15</sup> Independent Advisory Panel on Deaths in Custody and Magistrates Association, Effective community sentences and the role treatment requirements can play in preventing deaths in custody, June 2019. Available at: [MA-IAP-survey-final-270619.pdf \(magistrates-association.org.uk\)](https://www.magistrates-association.org.uk/wp-content/uploads/2019/06/MA-IAP-survey-final-270619.pdf), Magistrate, Optimism about community sentences, September 2020, Available at: [Magis August 2020 rev \(squarespace.com\)](https://www.squarespace.com/magis-august-2020-rev), Probation Quarterly, Effective community sentences: the role of treatment requirements, September 2020 [Accessed on 26/01/2022]

<sup>16</sup> Ministry of Justice, Offender Management Statistics Quarterly, table 4.4. April to June 2021, Available at: [Offender management statistics quarterly: October to December 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91222/offender-management-statistics-quarterly-october-to-december-2020.pdf) [Accessed on 25/01/2022]

number of pre-sentence reports (PSRs) prepared by the Probation Service decreased by 68% between 2010 and 2020 to 68,077<sup>17</sup>. This period also marked a greater reliance on verbal reports done on the day of sentence instead of ones which were considered over a longer adjournment period. This must be addressed. Gender informed approaches, both in courts (through Liaison and Diversion teams) and the community, are important. We understand that NHS England Commissioners and the probation service are progressing work in this area.

### *Residential Women's Centres*

24. The strategy promised to work with local and national partners to develop a pilot for residential women's centres in at least five sites across England and Wales. This would have developed a diversion option and led to fewer women entering custody. RWCs provide an alternative for women away from custodial sentences and provide housing and offer a location at which to complete programmes. This includes offering stability to those on prison licences the opportunity to engage instead of breaching licence conditions and facing recall.
25. There appears to be some way to go before this promise is delivered robustly. While one RWC was due to open in Wales before the end of 2021, there were considerable delays in finding a site as well as resource issues and delivery is now expected in March 2022<sup>18</sup>. The locations of the other four sites have yet to be established.
26. Rather than being run under the auspices of the MoJ alone, a cross-departmental arrangement with health services could be undertaken. Successful centres led by NGO's in Birmingham, Nottingham and Glasgow, amongst others, offer effective alternative models which should also be explored.

### **Better conditions for those in custody**

27. Initially efforts were made to implement changes outlined in the strategy notwithstanding very limited resources to better conditions for those in custody. Momentum does not appear to have been maintained across the female estate. During the pandemic, conditions for women deteriorated markedly, ranging from withdrawal of support to severely restricted regimes and from excessive periods behind bars to very limited contact with family and friends.
28. Problems remain with obtaining timely transfers for women with severe mental health needs. This has been raised by the NAO in its report on prison mental health<sup>19</sup>. Lack of availability of NHS beds in secure or medium secure units has led to the regrettable practice of 'gate-sentencing' where, at the point of release from custody, women are detained under the Mental Health Act and removed to hospital.

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<sup>17</sup> Ministry of Justice, Offender management statistics quarterly: October to December 2020 and annual 2020, Available at: [Offender management statistics quarterly: October to December 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/offender-management-statistics-quarterly-october-to-december-2020) [Accessed on 25/01/2022].

<sup>18</sup> National Audit Office, Improving outcomes for women in the criminal justice system, January 2022, Available at: [Improving outcomes for women in the criminal justice system \(nao.org.uk\)](https://www.nao.org.uk/reports/2022/improving-outcomes-for-women-in-the-criminal-justice-system/) [Accessed on 25/01/2022]

<sup>19</sup> National Audit Office, Mental health in prisons, June 2017, Available at: [Mental health in prisons \(nao.org.uk\)](https://www.nao.org.uk/reports/2017/mental-health-in-prisons/) [Accessed on 25/01/2022]

29. We welcome the planned introduction of the keyworker scheme to the women's estate and an improved version of the system (ACCT) for monitoring, and mitigating, risk of suicide and self-harm.
30. We also welcome the work of the National Women's Prisons Health and Social Care Review, chaired by IAPDC member Jenny Talbot OBE, which was established to improve health and social care outcomes for women in prison and upon their release, to reduce inequalities and ensure equity of access to the full range of health and social care services across the Women's Estate.

### *Family ties*

31. The strategy discussed the importance of building better links with children and families. Some progress has been made in this area. For example, we welcomed the prompt take-up of the IAPDC's recommendation in 2017 for the introduction and retention of PIN phone numbers within the female estate that move with an individual as they move between prisons rather than risking a gap in communication while PIN phones are stripped down and re-instated. This has had a tangible impact on the lives of vulnerable women.
32. For responders to the IAPDC's 2017 consultation the most commonly cited factors leading to risk of self-harm and suicide when in prison related to separation from small children and the lasting impact of previous abuse. The report noted that approximately two thirds of women in custody have children under the age of 18 and that prison would be the first time that 85% of the mothers would be away from their children.
33. The Farmer Review highlighted the distance between a prisoner and her children as being especially problematic and distressing. Plans for having prisons for specific cohorts of female offenders may exacerbate this<sup>20</sup>.
34. During the pandemic, the IAPDC, working with the Prison Radio Association, conducted two consultations with people in prison. The first briefing, 'Keep Talking, Stay Safe', produced in May, to which 135 men and 19 women contributed, and the second, 'Just One Thing', produced in September, to which 36 men and six women contributed, reflected cross-gender themes<sup>21</sup>.
35. These ranged from good communication to safeguards against the virus; from contact with family to support from, and for, staff; and from active regimes to response to mental health need. Contributions from women placed particular emphasis on the need for good relationships with staff.
36. The COVID-19 period has demonstrated the positive possibilities posed by digital services, such as cell phones and video calling. This 'digital equivalence' should be

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<sup>20</sup> Lord Farmer, The Farmer Review: The Importance of Strengthening Female Offenders' Family and other Relationships to Prevent Reoffending and Reduce Intergenerational Crime (June 2019). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/809467/farmer-review-women.PDF](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809467/farmer-review-women.PDF). [Accessed on 25/01/2022]

<sup>21</sup> IAPDC, Keep talking, Stay safe: A rapid review of prisoners' experience under COVID-19, May 2020. Available at: <https://www.iapondeathsincustody.org/news/keep-talking-stay-safe>; IAPDC, Just one thing: Prison safety and COVID-19, September 2020. Available at: <https://www.iapondeathsincustody.org/news/just-one-thing> [Available at 25/01/2022]

continued to support prisoners accessing contact with family members, as well as medical professionals, though should not come at the expense of face to face contact and in-person visits.

37. We understand that all but one of the closed women's prisons now has access to in-cell telephony.

#### *Self-harm*

38. The strategy outlines commitments to improve safety in female establishments, including through individual and tailored interventions for women and using a trauma-informed environment to address self-harm. It also acknowledged that short custodial sentences do not deliver the best results, and that custody can be particularly damaging for women who are twice as likely to report suffering from anxiety and depression than men<sup>22</sup>. Yet MoJ expenditure is committed almost entirely on building more prison cells for women.

39. The IAPDC's report on women in prison identified the significance of prior experience on current self-harm and suicide risk. 53% of women prisoners reported experiencing abuse as a child, compared to 27% of men; Almost half (46%) of women in prison had attempted suicide at some point in their lives, more than twice the rate of men (21%) and considerably higher than 6% in the general population. A third of women had had a previous psychiatric admission prior to imprisonment compared to 10% of men<sup>23</sup>.

40. Factors leading to self-harm in prison are therefore long-term issues, meaning responses within prisons must be joined-up with services in the community. Health and social care have particularly important roles to play. The women's estate must be a trauma-informed environment which is supportive and caring, to the degree that this is possible within a custodial setting.

41. The IAPDC-organised 'Keeping Safe' conference in February 2020 built upon the panel's Keeping Safe report from 2017. Professor Seena Fazel, a panel member, presented research findings relating to the most prevalent risk factors for self-inflicted deaths for both genders. This included the use of single cells (which amplified risk by 9x); previous attempts (8x); psychiatric diagnosis (6x) and alcohol problems (3x)<sup>24</sup>.

42. Risk factors associated with self-harm included being of a younger age; having either a life sentence or remaining unsentenced or on remand and being of white ethnicity. For women it was found that an index offense of violence, having a recent bereavement or suffering past abuse were also significant risk factors. Being female also raised the risk of repeating self-harm by eight times and the subsequent risk of suicide.

43. We welcome work to introduce the latest version of the Assessment, Care in Custody and Teamwork (ACCT) process and the development of gender-informed training for

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<sup>22</sup> Ministry of Justice, Gender differences in substance misuse and mental health amongst prisoners, 2013, Available at: [Gender differences in substance misuse and mental health amongst prisoners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) [Accessed on 25/01/2022]

<sup>23</sup> Prison Reform Trust, There's a reason why we're in trouble (2017). Available at: [http://www.prisonreformtrust.org.uk/Portals/0/Documents/Domestic\\_abuse\\_report\\_final\\_lo.pdf](http://www.prisonreformtrust.org.uk/Portals/0/Documents/Domestic_abuse_report_final_lo.pdf). [Accessed on: 25/01/2022]

<sup>24</sup> Zhong, S., Senior, M., Yu, R., Perry, A., Hawton, K., Shaw, J. & Fazel, S, 'Risk factors for suicide in prisons: a systematic review and meta-analysis', The Lancet Public Health, 6(3), 2021, e164-e174.

staff as the Offender Management in Custody (OMiC) system is rolled out in the female estate. Overall culture change will do more than individual initiatives.

44. Again, short sentences are damaging and highly disruptive to continuity of care. Investment in preventative work and alternatives that command the confidence of the courts, as well as eradication of the use of prison as a place of safety, are vital. Custodial settings are by their very nature traumatic, an issue exacerbated by the age of many women's prisons, originally designed for men.
45. Research to develop effective interventions that prevent self-harm should be prioritised and facilitated across both the male and female estate.

### **Conclusion**

46. The IAPDC submitted evidence and recommendations to Ministers which were accepted and intended to be implemented alongside the Female Offenders Strategy. The IAPDC is concerned that significant work is needed to complete the implementation of the recommendations outlined in the strategy. In particular, attention should be paid to investing in alternative options that divert women away from custodial sentences such as community sentence treatment requirements (CSTRs) or residential women's centres which help to reduce the number of women entering the prison system.
47. The IAPDC is grateful to be able to submit written evidence to the inquiry and would welcome the opportunity to provide further information or oral evidence if required by the Committee.

**January 2022**

## **Annex A: Recommendations from the report by the Independent Advisory Panel on Deaths in Custody on Preventing the Deaths of Women in Prison, 2017**

### *In the community*

- Ensure adequate information is provided to the courts including reports covering mental health need, vulnerability and safeguarding concerns.
- Encourage greater use of community sentences by the courts to include treatment orders.
- Coordinate national and local government leadership focus on prevention and the strategic reduction of women's prison numbers.
- Roll-out liaison and diversion services across police stations and courts
- Increase investment in women's services in the community and look to models of local authority pooled budgeting as in Greater Manchester.
- Develop a sustained network of women's centres.
- Co-ordinate a multi-disciplinary response to vulnerable women involving family support and domestic violence services as well as health and justice provision.

### *In prison*

- End delays in receiving prescribed medication on arrival and improve contact between GPs and prison healthcare.
- Improve arrangements for first night in custody.
- Conduct transfers in a longer-term planned manner, with more information provided to the women being moved.
- Improve drug and alcohol treatment in custody linked to treatment in the community.
- Encourage and support self-help groups and peer support, in particular sustaining a team of Samaritan Listeners and Insiders.
- Improve physical environment and remove ligature points from women's cells/rooms.
- Ensure multi-disciplinary ACCT reviews, specifically including mental health staff.
- Provide mandatory mental health awareness training for staff and establish a system of staff support and supervision.
- Enable and support women to maintain family contact (see section on family contact).
- Focus the whole prison environment on promoting the mental and physical health and wellbeing of all prisoners in a trauma-informed way (see section on mental health).

### *Mental health*

- Develop a gender-aware and trauma-informed environment in all women's prisons including staff training on the impact of separation and loss, and awareness of perinatal mental health and support for women at risk.
- Roll out higher level of emergency response training for all staff.
- Ensure every Mental Health Trust has a clinical lead for women's mental health.
- Provide a greater range of mental health and substance misuse treatments, including the provision of counselling services and talking therapies, in the community.
- Provide counselling services to all women prisoners. Each women's prison should employ a counsellor with placements for trainees routinely, and a national lead for counselling services should be instituted.
- Establish thorough-going mental health assessments for all within first 24 hours of arrival in custody.
- Review implementation of the Care Act 2014 which placed preventative duties on local authorities and required them to meet social care needs

- Ensure access to secure mental health accommodation is available in a timely manner to those who need it, prisons should not be used as places of safety.

#### *Transfer of information*

- Ensure healthcare staff routinely share matters of risk of suicide with prison staff, in accordance with the IAP's Information Sharing Statement.
- Develop a shared care plan for each woman to which she can contribute.
- Plan the transfers of women between prisons carefully with a standard form/template developed for handover and information regarding risk of suicide and self-harm.
- Ensure that women can retain their own information on transfer including their pin phone numbers. • Learn and embed lessons set out by coroners, the Prison and Probation Ombudsman and the IPCC in improved transfer of information between agencies and establishments to keep women safe. • Achieve compatibility between health information systems in England and Wales
- Put in place local information sharing protocols between all relevant health and justice, including liaison and diversion, services.
- Adopt nationally the updated Person Escort Record (PER) form with space to add information about risk as endorsed by the National Police Chief's Council.
- Improve communication and information transfer between GP's, midwives and prison healthcare. • Improve communication between agencies during preparation for release.

#### *Family contact*

- Impose community sentences, with family and domestic violence support where necessary, unless the offending is so serious or dangerous that only a custodial penalty will suffice.
- Create a custodial system closer to homes in smaller more residential accommodation linked to health and other local agencies.
- Implement in-cell telephones in all women's prisons, and enable women to make free emergency telephone calls where necessary.
- Maximise family contact through better technology, to include use of videoconferencing and visiting arrangements.
- Consider and extend the use of release on temporary license (RoTL).
- Train and support staff for work with families and appoint family support/liason officers in all establishments.
- Establish and maintain sustained partnerships with voluntary organisations offering family support. • Provide and make accessible to women in prison the 24 hour Freephone, National Domestic Violence Hotline, run in partnership between Woman's Aid and Refuge.
- Encourage family engagement in ACCT reviews.

#### *Preparation for release*

- Ensure preparation for release is ongoing, forming part of a regularly reviewed sentence plan and engendering hope and a sense of future important to suicide prevention.
- Increase use of release on temporary license (ROTL) to enable women to resume contact with family and caring responsibilities and to undertake voluntary or paid work and training in the community.
- Oblige local authorities to provide safe housing for women prisoners who would otherwise become homeless at the point of release.
- Continue on release, if started in prison, mental healthcare and treatment for addictions.

- Provide social care support and mentoring on release for women with learning disabilities or learning difficulties.
- Review, and reinforce, compliance with Section 10 of the Offender Rehabilitation Act which requires commissioners and providers to take account of the particular needs of women in making supervision and rehabilitation arrangements.
- End recall to custody for most forms of technical breach of license and strengthen supervision arrangements instead