

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) ar [Profiadau menywod yn y system cyfiawnder troseddol](#)

This response was submitted to the [Equality and Social Justice Committee](#) consultation on [Women's experiences in the criminal justice system](#)

WECJS 16

Ymateb gan: Prison Reform Trust | Response from: Prison Reform Trust

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## **Prison Reform Trust response to the Welsh Senedd Equality and Social Justice Committee consultation – Experiences of the criminal justice system: women’s experiences in the criminal justice system – September 2022**

The Prison Reform Trust (PRT) is an independent UK charity working to create a just, humane and effective penal system. We do this by inquiring into the workings of the system; informing prisoners, staff and the wider public; and by influencing parliament, government and officials towards reform. PRT provides the secretariat to the All Party Parliamentary Penal Affairs Group and has an advice and information service for people in prison.

The Prison Reform Trust's main objectives are:

- reducing unnecessary imprisonment and promoting community solutions to crime
- improving treatment and conditions for prisoners and their families
- promoting equality and human rights in the criminal justice system.

[www.prisonreformtrust.org.uk](http://www.prisonreformtrust.org.uk)

### **Introduction**

PRT has a longstanding focus on reducing women’s imprisonment. We welcome the opportunity to respond to this consultation on the experiences of Welsh women in the criminal justice system.

Although in Wales criminal justice is not devolved, most of the solutions to women’s offending, and the basis for effective preventive strategies, lie outside the justice system in other areas of social policy. Powers in relation to violence against women and girls, housing, social care and some aspects of health provision are devolved and can play a critical role in supporting women with multiple or complex needs, helping to prevent them coming into contact with the criminal justice system. If they have been involved in offending, policies and services in these areas can support women to turn their lives around.

### **Progress**

There has been some welcome progress nationally in the approach to women in the criminal justice system. The UK government’s Female Offender Strategy<sup>1</sup> was published in 2018, setting out a distinct approach to women in contact with the criminal justice system in England and Wales. The strategy’s focus on early

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<sup>1</sup> Ministry of Justice. (2018). Female Offender Strategy.  
<https://www.gov.uk/government/publications/female-offender-strategy>

intervention, community-based solutions and delivering decent conditions for those women who do have to be in prison, as well as an aim to reduce female prison places were welcomed. However, implementation has been slow and recent reports from the National Audit Office<sup>2</sup>, Public Accounts Committee<sup>3</sup> and House of Commons Justice Committee<sup>4</sup> have highlighted a lack of governance, no clear timetable for delivery and limited dedicated funding. The Ministry of Justice committed to a delivery plan for the strategy but this is yet to be published.<sup>5</sup>

PRT welcomed the Welsh government's Female Offending Blueprint when it was published in 2019. It set out a clear agenda for reform, bringing together partner organisations and had a clear focus on early intervention and diversion. Alongside the blueprint, clear deliverables have been developed, with responsible agencies assigned. Progress on implementation of these deliverables is regularly reported against at the regular All Wales Women in Justice board meetings, which PRT attends.

There are no women's prisons in Wales, and so many women in prison are held a considerable distance from home. They are likely to receive fewer visits which will affect their ability to maintain relationships and family contact. However, PRT and others have consistently argued that the absolute priority for the future of the custodial estate in England and Wales should be to plan for fewer women in custody, not for a women's prison in Wales. The focus of the blueprint then on community alternatives and a reduction in short prison sentences is key to better supporting Welsh women in contact with the criminal justice system. The risk of focusing on custodial provision is that it diverts attention and resource from this prior task of reducing to an absolute minimum the need for prison accommodation in the first place.

### **Residential Women's Centre**

PRT is concerned about the lack of women centre provision in Wales. If the new centre can fill some of this unmet need by better supporting women in the community and diverting some women from short prison sentences, it will be a good thing. However, we are concerned that the centre should not become a prison in all but name. Residents will still be required to reside in the centre overnight, even if they will be free to leave during the day within the requirements of the sentence. Given that the centre is intended only to serve women in the local community, it is unclear what this residential requirement is designed to achieve. Any requirement which leads to women having to leave their home for extended periods will disrupt home and family life – factors which are protective of risk of reoffending. Provision will therefore need to be carefully targeted to women for whom the residential element of the centre will be a positive benefit. Effective resettlement arrangements will also

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<sup>2</sup> National Audit Office. (2022). Improving outcomes for women in the criminal justice system. <https://www.nao.org.uk/report/improving-outcomes-for-women-in-the-criminal-justice-system>

<sup>3</sup> Committee of Public Accounts. (2022). Improving outcomes for women in the criminal justice system. House of Commons.

<https://publications.parliament.uk/pa/cm5802/cmselect/cmpubacc/997/report.html>

<sup>4</sup> Justice Committee. (2022). Women in Prison. House of Commons.

<https://publications.parliament.uk/pa/cm5803/cmselect/cmjust/265/report.htm>

<sup>5</sup> 4 Ministry of Justice. (2022). Prisons Strategy White Paper: response to consultation questions. <https://www.gov.uk/government/publications/prisons-strategy-white-paper>; See also House of Commons written question 20299. 27 June 2022. <https://questions-statements.parliament.uk/written-questions/detail/2022-06-17/20299>

need to be in place to ensure that women can transition to secure and stable accommodation once their sentence comes to an end.

Furthermore, we are concerned that investment in the centre should not lead to the neglect of, and reduction in funding for, existing women's centres. These centres already provide tailored support in a one stop shop for women along the lines the residential women's centre proposes. These centres require long-term funding in order put community provision for women on a sustainable basis.

### **Local area data<sup>6</sup>**

Wales has seen a reduction in women's imprisonment by 41% between 2017 and 2021. However, many women continue to be sent to prison on short sentences. 60% of prison sentences given to women in Wales in 2021 were for less than six months, and 70% were for less than 12 months. There continues to be considerable local variation in the use of short sentences. Broken down by police force area, the majority of sentences continue to be for less than six months:

- Dyfed-Powys: 93% of prison sentences (13 of 14) given to women in 2021 were for less than six months.
- Gwent: 88% of prison sentences (22 of 25) given to women in 2021 were for less than six months.
- North Wales: 61% of prison sentences (48 of 79) given to women in 2021 were for less than six months.
- South Wales: 55% of prison sentences (134 of 243) given to women in 2021 were for less than six months.

**The Prison Reform Trust  
September 2022**

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<sup>6</sup> Ministry of Justice. (2022). Outcomes by offence data tool. Criminal Justice System statistics quarterly: December 2021. [Criminal Justice System statistics quarterly: December 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2021)