

A Response to

***Draft Strategy for the Management of
Women Offenders in Northern Ireland:
A Consultation***

By
Women's Support Network

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1. Introduction

- 1.1.** The Women’s Support Network (WSN), established in 1989, is an infrastructural umbrella organisation, which provides support services to, and represents over 40 groups (see Appendix 1 for full member and associate member listing) including: community-based Women’s Centres, women’s projects and women’s infrastructure groups.
- 1.2.** WSN aims to achieve social, political and economic justice through the promotion of the autonomous organisation of women. The Network aims to strengthen the collective voice of women’s groups and to promote and develop networking opportunities, to enable collective action and to impact upon policy and decision making processes. The WSN provides an accessible, feminist, relevant and high quality support service and resource for its member groups. The Network is also an important information resource on issues relevant to community-based women’s organisations and for other infrastructure groups, nationally and internationally.
- 1.3.** The Women’s Support Network (WSN) welcomes the opportunity to respond to the *Draft Strategy for the Management of Women Offenders in Northern Ireland*.
- 1.4.** This response has been produced in consultation with NIACRO and with our members from the community based women’s sector who provide a range of support and advice, education and training, health, childcare and

other services to women and children in disadvantaged areas, including those who have experience of the criminal justice system.

2. General Comments

2.1. We welcome the use of the Corston Report (2007) as a basis for addressing the particular needs of women offenders in Northern Ireland, and are encouraged by the commitment to take a “radical approach to the issue here.”

2.2. We commend plans to develop a women-centred multi-agency strategy, which attempts to understand the particular challenges women face in their lives which create the conditions that may lead to their offending, and acknowledges the need to support women and their children in their communities as a long term approach to reduce and divert women from prosecution and custodial sentences.

2.3. We believe that engagement with the community/voluntary sector in general, and the community based women’s sector in particular, is vital to meeting the underpinning aims of the Strategy.

2.4. The community based women’s sector offer a wide range of women-centred services across Northern Ireland, including (but not limited to):

- Specialist advice for women – e.g. housing, benefits, domestic violence, et cetera
- Childcare and family support
- Counselling, Support and Advocacy
- Complimentary Therapies
- Training & Education
- Health and Wellbeing programmes

- Personal Development and Employment Support
- Volunteering, Leadership and Empowerment

2.5. We are concerned that a statutory run facility for women offenders being called a “Women’s Centre” would cause confusion with what is a long-established definition and understanding of what Women’s Centres are, and the work they do within the community/voluntary sector.

2.6. For example, there are seven Women’s Centres within the greater Belfast area:

- Atlas Women’s Centre
- Ballybeen Women’s Centre
- Falls Women’s Centre
- Footprints Women’s Centre
- Greenway Women’s Centre
- Shankill Women’s Centre
- Windsor Women’s Centre

2.7. These Centres are actively connected within local and regional community based structures that exist in Northern Ireland, including the Women’s Support Network, and have developed particular expertise, experience and reputation for providing services such as those listed above.

2.8. We recommend that any statutory funded facility for women offenders is not called a Women’s Centre, and that an alternative, appropriate name is determined in consultation with the community based women’s sector.

2.9. Many WSN member groups have developed a wealth of experience and expertise in how to best meet the needs of women at a local level,

particularly in disadvantaged areas, and have a history of supporting women on community service orders. We believe that community based women's organisations are well placed to meet the overarching aims of the Strategy, particularly as women offenders and their children will be treated as women and children first, with accessible and affordable childcare in place that allows women to take part in the centre's activities and avail of services while the needs of their children are being met, and an environment where they have an opportunity to form relationships with other women in their own areas, therefore addressing social isolation and promoting the development of informal support networks.

2.10. We therefore also seek assurance that any services being proposed by a statutory funded facility for women offenders do not duplicate and/or act in competition with the services already provided by Women's Centres in the community/voluntary sector.

2.11. There are several past and present examples of good practice between criminal justice agencies and the women's sector. However, the manner and extent to which the current Strategy will engage with, access the services of, and support existing provision for women by the community based women's sector is understated within the current proposals.

2.12. It is vital to acknowledge that the community based women's sector, like the rest of the community/voluntary sector in Northern Ireland, has suffered from a lack of regional investment and development. Women's Centres regularly deal with complex issues in areas of deprivation and communities affected by the conflict in Northern Ireland on a day to day basis.

- 2.13. The women's sector has traditionally struggled to have the level of expertise and quality of services provided for women and their children in their local communities acknowledged, or to gain adequate funding through statutory services and local government to sustain and develop their organisations to meet the high level of demand placed upon them.
- 2.14. In spite of often being only able to attract short term funding, and having limited capacity to lobby politically for greater commitments to gender equality in policy making and budget decisions, Women's Centres have still managed to provide essential core services to women in disadvantaged areas such as childcare facilities, training and education provision, and advice services, while promoting a women-centred and holistic approach to meeting the needs of their communities.
- 2.15. While the community based women's sector possesses the drive, expertise and commitment to meet the needs of all women who wish to access their services, many of the core work provided by the community based women's sector across Northern Ireland remains under threat due to financial under-investment, further exacerbated by a trend towards *gender-neutral* policies, which fail to recognise the particular needs of women in policy decisions and allocating budgets. Therefore, lack of adequate and sustainable investment remains as the main barrier to the women's sector developing their capacity to support women on the ground.
- 2.16. Therefore, any proposals to engage the community/voluntary sector, whether through partnership initiatives or through a system of referral and service level agreements between statutory agencies and the community based women's sector, must address the financial investment required to do such work.**

The funding required by community based support services must be calculated and allocated, in real terms, to each and every women offender being managed in the community. These costs must be factored into an overall budget for the implementation of the Strategy.

- 2.17. We believe that with adequate initial investment and appropriate budgeting to meet the needs of each woman being supported in the community, and with genuine engagement by statutory agencies to work in partnership with the community/voluntary sector, the community based women's sector is best placed to provide support to women necessary to reduce offending, to provide alternatives to custody, to support children, and to address the particular issues women experience as a result of rape and domestic abuse, lack of educational attainment, poverty and debt, social isolation, substance misuse and poor mental health.
- 2.18. We therefore recommend and welcome a commitment from NIO to initiate a process of engagement with the community based women's sector and other community/voluntary groups such as NIACRO as soon as possible, with a view to:
- (a) cementing relationships and understanding of the respective roles of statutory agencies and community based women's organisations in meeting the needs of women offenders and their children;
 - (c) scoping the extent to which services within the community based women's sector are already best placed to help meet the overarching aims of the Strategy, and determining the actual cost of providing these services; and
 - (b) developing a coordinated, partnership-based process of working between statutory agencies and the community based women's sector.

3. Specific Comments

3.1. Providing Alternatives to Prosecution and Custody

- 3.1.1.** WSN is concerned that nearly 40% of all custodial sentences are resulted from women's inability to pay low level fines imposed for relatively minor offences. WSN is hopeful that this will also be addressed by the recent Fine Default consultation.
- 3.1.2.** Imposing imprisonment on women who are unable to pay fines cannot be justified as being within the public's best interest, and given the significant impact such sentencing has women's ability to provide for and maintain access to their children, we believe this is wholly disproportionate.
- 3.1.3. We therefore seek clarification as to how the Strategy will address the current court system and what plans will be put in place to influence such judiciary decisions. We recommend that the Scottish model of cautions (an alternative to fines) for consideration.**
- 3.1.4. We believe the proposals set out by the Strategy will be effective. The community based women's sector has the expertise and will to work with women offenders, particularly if many of these women have complex mental health needs, and require professional specialist advice in areas such as domestic violence, debt and poverty. However, significant resources will need to be put into the community/voluntary sector to provide women offenders with the professional and quality support they require and deserve.

3.2. Reducing Offending

3.2.1. We agree with the nine pathways to reduced offending.

3.2.2. Accommodation

3.2.2.1. Clearly there is a dearth of appropriate social housing in Northern Ireland generally. We would therefore encourage closer working between criminal justice services, the Housing Executive and community based housing provision such as Simons Community and local housing associations.

3.2.2.2. We suggest that models of best practice in other jurisdictions be explored and evaluated for potential positive outcomes to women offenders and their children who at risk of being made homeless.

3.2.3. Education, Training and Employment

3.2.3.1. WSN is particularly interested in how the Strategy will involve the community based women's sector in the provision of education, training and employment, and childcare, which we are inextricably linked.

3.2.3.2. Women's Centres have provided education opportunities to some of the most marginalized and disadvantaged women for over 25 years (from essential skills to university access¹). The community based women's sector is unique in its ability to provide women-only education and training to women who often lack the confidence to enter into mainstream further education. These women-only

¹ A copy of the Community Based Women's Sector Prospectus 2007-2008 has been included to provide an overview of the type of education and training available to women. This prospectus is due to be updated for the next academic year.

environments support the development of basic skills, and personal development, which can give women the confidence they need to progress onto future higher education, vocational training and employment.

3.2.3.3. This provision should be adequately signposted so women offenders are made aware of the range of choices and opportunities that exist as an alternative to mainstream further and higher education institutions.

3.2.3.4. Community based women's education and training provision supports learning through affordable and accessible childcare, which remains the primary barrier to women in disadvantaged areas from accessing education.

3.2.3.5. Due to the nature of the areas in which Women's Centres operate, many have developed particular expertise in meeting the needs of women from minority ethnic backgrounds. These women can be particularly isolated and therefore benefit from the extra support and signposting provided by Women's Centres.

3.2.3.6. For example, Windsor Women's Centre has responded to the increased number of families coming to live in the South Belfast area from other countries, by offering specific programmes for women from ethnic minority backgrounds, particularly those who whose first language is other than English. In addition to education and training opportunities, the Centre helps them to register with GPs, liaise with schools and access services, enabling them to with their local community.

3.2.3.7. There is therefore a great opportunity to pilot and implement community-based education programmes that meet the needs of women offenders and their children, in partnership with the women's sector to help reduce offending behaviour.

3.2.4. Health, Alcohol and Substance Misuse

3.2.4.1. WSN members working in the community regularly have women present to them who are in crisis, either due to poor mental health or to alcohol and drug misuse. Workers and volunteers report great frustration at the difficulties they face in getting women for access to appropriate mental health and addiction services.

3.2.4.2. We are concerned that mental health provision and addiction support services for women are grossly inadequate throughout Northern Ireland.

3.2.4.3. We would therefore welcome a resourced, multi-agency strategic approach to improving and investing in mental health and addiction support specifically for women.

3.2.5. Finance, Benefit and Debt

3.2.6. The community based women's sector provides a range of advice services for women and families.

3.2.7. Falls Women's Centre and Causeway Women's Aid are currently the only providers in Northern Ireland who offer a women-only advice service, providing general and specialist advice that meets the particular needs of women, by women.

3.2.8. The benefit of a professional women-only advice service is that it offers a safe space where women can access information on benefits, debt management, family law, rape and domestic violence, et cetera, from advisors who may have had similar personal experiences to them, and who have a particular understanding of her situation, that generalist advice providers such as CAB may not have.

3.2.9. Services within the community based women's sector should be signposted and supported.

3.2.10. Children and Families

3.2.10.1. We seek clarification regarding the role of Family Support Packages in meeting the needs of women offenders and their children. We also seek clarification on the role of extended families and fostering agencies.

3.2.10.2. WSN supports the work currently being done with NIACRO and Barnardos, and welcome the development of "family contact facilities" provision for women to maintain their relationship and to bond effectively with their children while in custody.

3.2.10.3. We encourage the Strategy to avail of and resource the childcare provision that currently exists to support women in disadvantaged areas through Women's Centres.

3.2.11. Attitudes, Thinking and Behaviour

3.2.11.1. WSN supports further research into the need for gender-specific initiatives and asks that the community based women sector be engaged and consulted throughout this process.

3.2.12. *Supporting Women who have been abused raped or who have experienced domestic violence*

3.2.13. WSN encourages work with specialist services such as Women’s Aid and the Belfast Rape Crisis Centre to provide support to women who have been abused raped or who have experienced domestic violence.

3.2.14. *Supporting women who have been involved in prostitution*

3.2.15. We encourage further research into the needs of women who have been involved in prostitution and trafficking.

3.3. Restorative Interventions

3.3.1.1. WSN asks that an evidence based review be carried out on the benefits of restorative interventions specifically for women in comparison with other comparable jurisdictions. We further believe that independent evaluations are factored into the development of future restorative intervention programme for women offenders.

3.4. Gender-Specific Community Supervision and Interventions

3.4.1. As discussed, WSN does not support the name “Women’s Centre” but we believe the pilot based in Belfast has already been renamed *Inspire*, by the women involved, which we support.

3.4.2. We suggest that the future name for a statutory funded facility for women offenders be determined in consultation with the community based women’s sector.

3.4.3. WSN welcomes the proposal to provide women-specific services and believe that it will have a positive impact on women in the criminal justice system.

3.4.4. WSN further welcomes the commitment to significantly develop links with our membership over the course of the pilot.

3.4.5. The Strategy must address the financial investment required for the community based women’s sector to engage in this work. Furthermore, funding to provide community based support services must be calculated in real terms, and ring fenced to follow each women offender being managed in the community. These costs must be factored into an overall budget for the implementation of the Strategy.

3.4.6. We suggest that models of hostel accommodation in other comparable jurisdictions be thoroughly investigated, taking into account the needs women offenders, and the needs of their children².

3.4.7. NIO/NIPS should resource the women’s sector to research, pilot and evaluate community based preventative interventions for women, that will lead to the development of policy to reduce offending.

3.5. Developing a Gender-Specific Approach to the Management of Women in Custody

3.5.1. We reserve judgment on any future proposal to build a new purpose built women’s prison until a formal Outline Business Case is made, however we would expect that this proposal will take a radical approach, distinct from any model based on managing male offenders.

² In adherence with UN Convention on the Rights of the Child. We suggest that you consult with the Children’s Law Society and other children’s rights organisations during this process.

- 3.5.2.** As statistics reveal that many women offenders have been coerced into offending by men (including prostitution and trafficking), and have experienced rape, sexual violence, and domestic abuse, they would be particularly vulnerable to further abuse while in custody.
- 3.5.3.** We therefore wish to know whether positive action measures for the recruitment of female prison officers and support staff has been considered as a means of achieving a women-centred approach to managing women in custody.
- 3.5.4.** We would also be interested to know what measures are being taken to train prison officers and support staff in gender awareness, the particular needs of women in prison, and the development of gender sensitive practice.
- 3.5.5.** WSN encourages investment in the provision of essential skills and vocational training programmes to women in custody as a means of helping women out of the socio-economic factors that may lead to offending. If women are helped to overcome low literacy & numeracy skills, are helped to achieve qualifications and gain access to better paid employment, we believe they will be more likely to succeed after they leave prison.

3.6. Equality and Human Rights Issues

- 3.6.1.** We are interested to know how women offenders and women with experience of the criminal justice system have been engaged in the development of the Strategy. Furthermore, we would like to know how women taking part in the Belfast based pilot are able to express their views and give feedback on its impact.

3.6.2. In general, we believe that the Strategy will have a positive impact on women's equality and human rights. We further believe that the proposals will have a positive impact on the children of women offenders, although we encourage further consultation with children's rights groups and the community based women's sectors to ensure that future policy protects, and acts in the best interests of children.

3.6.3. Given that the pilot limited to a central urban setting, consideration must be given to the particular needs of women in rural and disadvantaged areas before developing the model beyond Belfast city centre.

3.6.4. Any developments following from the current pilot must be subjected to a robust and transparent EQIA based on all 9 categories of Section 75³.

4. Conclusion

4.1. WSN broadly welcomes the vision and aims of the Strategy, and the focus away from viewing women offenders as mere criminals. We applaud the considered exploration of why women, who are particularly vulnerable to certain circumstances in their lives, become part of the criminal justice system⁴.

4.2. We believe the nine pathways identified to help reduce offending are appropriate, and will lead to positive outcomes for women and their children.

³ Northern Ireland Act (1998)

⁴ As identified by Baroness Jean Corston (2007)

- 4.3. It is essential that NIO/NIPS adopt a partnership approach to engaging with the community based women's sector as part of the Strategy. With adequate resources to support its current infrastructure, appropriate signposting and information sharing, and funding for specific work with women offenders, the women's sector is best placed to provide specialist advice, support, training and education, and childcare to women in their communities.

- 4.4. A partnership approach between statutory services and the women's sector, alongside other key community organisations such as NIACRO and Barnardos, will ensure that more effective rehabilitation and re-integration by women offenders in the community is achieved.

WSN Member groups

All Ireland Mother's Union
Antrim & Ballymena Women's
Aid
Ardmonagh Women's Group
Ardoyne Women's Group
ATLAS
Al Nisa Women's Group
Ballybeen Women's Centre
Ballymurphy Women's Group
Belfast & Lisburn Women's Aid
An Munia Tober (Travellers)
Carrickfergus Women's Forum
Carew II
Causeway Women's Aid
Clan Mor Women's Group
Derry Well Woman
Derry Women's Centre
Falls Women's Centre
First Steps Women's Group
Footprints Women's Centre
Foyle Women's Aid
Foyle Women's Information
Network
Granaghant District Women's
Group
Greenway Women's Centre
Kilcooley Women's Centre
Lesbian Advocacy Services
Initiative
Lesbian Line

Lenadoon Women's Group
Ligoneil Family Centre
Markets Women's Group
NI Women's Aid Federation
NIWEP
Newry & Mourne Women
Older Women's Network
Omagh Women's Aid
Rape Crisis Centre
Shankill Women's Centre
Strabane & Lifford Women's
Centre
Windsor Women's Centre
Women into Politics
Women's Information Group
Women's News
Women's TEC
WRDA

Associate Members

Ballymena Community Forum
EBCEC
HIV Centre
Newtownabbey Community
Voice
Parents Advice Centre
WEA
Rasharkin Women's Group
Affiliated Members
National Women's Council of
Ireland