

GENDER-SPECIFIC STANDARDS FOR WORKING WITH WOMEN PRISONERS

1. Pre Custody

1.1 Required outcome: Women prisoners are, where possible, transported separately from male prisoners. This should be recorded and monitored.

NIACRO believes there are no circumstances where women should be transported with men, so we seek clarification on what “where possible” will mean in practice. Standards should be written as though there is a separate women’s establishment.

NIACRO welcomes the close monitoring of this arrangement and recommends findings should be made known to key stakeholders.

1.2 Required outcome: Women prisoners are not handcuffed during escort unless a risk assessment indicates otherwise.

NIACRO is concerned NIPS will undertake their risk assessment on the basis of a woman prisoner’s crime, as opposed to her behaviour and whether she actually poses any risk to others/or is at risk of escape from custody. To prevent the risk of inappropriate handcuffing of women prisoners, the criteria for this process should be standardised and independently verified prior to general implementation.

1.3 Required outcome: Pregnant women should not be transported in standard cellular vehicles unless, exceptionally, the healthcare manager has assessed the risk to be acceptable.

The criteria used to make such an assessment should be made known and staff must fully understand the process, so it won’t change, even if there is pressure on resources.

1.4 Required outcome: PECCS should monitor the condition of the Court cells where prisoners are held.

There should be an agreed standard against which conditions can be assessed in respect of heat, cleanliness, fresh air, access to toilet facilities, etc. This should be made known to women in custody.

1.5 Required outcome: Maximum use of the video link should be made by the women’s prison of video links to enable women to avoid unnecessary journeys to court.

NIACRO agrees with this standard and the monitoring of these arrangements.

1.6 Required outcome: Information about the women’s prison is available for women and their families.

Having a leaflet available for women and for families is important but ensuring that people actually receive them is the priority. Therefore, some promotion of the availability of the leaflet(s) would be necessary and NIACRO proposes that, in addition to being available through the visitor’s centres and NIACRO, the information also be delivered in partnership with the legal profession; with

probation staff, with social services and with the voluntary and community sector organisations who work with women.

1.7 Required outcome: PECCS staff will have an awareness of the gender-specific needs of women prisoners.

NIACRO welcomes the commitment to gender-specific training for PECCS staff.

2. Reception and First Night

2.1 Required outcome: Women's experience of the reception process helps them to feel safe and reassured that they will receive help to address any urgent needs.

NIACRO welcomes the stated commitment to improving the reception process for women coming into custody and providing information about the first 24-hour period. It would be helpful if such information could also be given by DVD (with a range of languages in sub-titles).

2.2 Required outcome: The reception process takes account of the individual needs of each committal.

'Provisions to meet immediate needs' is outlined in the guidance and appears reasonable. However, telephone credit of only £1.00 is very limited, particularly if the prisoner needs to make a number of calls to sort out childcare arrangements. NIACRO believes there is no need for a financial limit in such circumstances.

2.3 Required outcome: An initial healthcare assessment to identify a woman's immediate healthcare needs should be completed prior to her moving to the committal landing. Healthcare staff will evaluate prisoners committed in possession of prescription medication.

Women should also be given some reassurance, particularly at weekends, that efforts will be made to verify prescriptions with the GP as soon as possible. If not already the case, NIPS should liaise with the pharmacist identified on the prescription drugs, to verify the dose for the individual concerned.

2.4 Required outcome: Women entering custody are searched thoroughly, but sensitively, according to the women's new search procedures.

NIACRO welcomes the introduction of new procedures for women but believes the procedure should be subject to ongoing scrutiny by the Independent Monitoring Board. The Board should have access to the written records and be given opportunity to seek feedback directly from women who have been recently committed.

2.5 Required outcome: Reception staff to take action to promote the safety of children if they are informed or suspect, that a woman's children may be at risk as a result of her imprisonment.

This is a very important issue and one which we acknowledge may give rise to high levels of anxiety for some women. Child protection awareness training

for reception staff may not, in itself, be adequate. Staff should also be trained to recognise and anticipate the negative impact of a mother's imprisonment on children and families and what actions they can take directly to alleviate their stress. Staff should also have access to an on-call number for social services.

2.6 Required outcome: All new committals are made to feel safe, secure and comfortable during their first 24 hours in custody.

The proposed list of items is welcomed by NIACRO, particularly an element of peer support, as having someone to talk to may be essential for some women.

3. Induction:

3.1 Required outcome: A structured, multi-disciplinary induction programme, containing information advice on all aspects of the prison regime is in place.

NIACRO welcomes the commitment to an induction process for women. Guidance for staff should specifically identify the availability of services in the community, such as Family Links and the support it offers to family members, especially children.

4. Healthcare

4.1 Standards being agreed between SE Healthcare Trust and NIPS.

It is regrettable that standards for healthcare – central for the well-being of women in custody – are not available as part of this consultation. NIACRO would like to see further consultation and/or clarification on what these standards may look like.

There should be evidence of communication and co-operation between healthcare services and NIPS for the benefit of prisoners, made easily available to relevant monitoring bodies.

5. Safer Custody

5.1 Suicide and Self Harm prevention

Required outcome: An effective Safer Custody Strategy is in place and communicated throughout the prison.

In spite of staff training, there continues to be a tendency to view self-harming behaviour as an indicator of risk of suicide, not taking account of the fact that many women in custody have a history of self-harming behaviour as a mechanism for coping with stress. Therefore, emphasis on offering strategies, alternative coping methods and advice about harm-minimisation is welcomed.

Required outcome: A regime which keeps women, particularly those with vulnerabilities, busy, and offers interventions which are likely to contribute to a reduction in self-harm, is provided.

NIACRO believes cell confinement should be kept to a minimum and the opportunities for 'purposeful activity' should be expanded considerably and focused on preparations for coping on release.

5.2 Bullying

Required outcome: Women feel safe from bullying and victimisation including verbal and physical abuse. Anti-bullying measures are well-publicised and inform all aspects of the regime.

Any policy dealing with bullying by other prisoners must address the needs of the victim, as well as the person responsible for the behaviour. NIACRO also recommends NIPS consider the use of restorative practices.

5.3 Child protection

Required outcome: An effective child protection policy ensures that all children are protected whilst visiting the women's prison, or residing in the mother and baby facilities.

NIACRO welcomes the commitment to awareness raising and top-up training for staff.

6. Day to Day Living

6.1 Progressive regimes and earned privileges.

Required outcome: An incentives scheme is in place that meets the gender-specific needs of the particular women's population.

NIACRO welcomes the acknowledgement that contact with family and particularly children, should not have any connection with the PREPS scheme.

6.2 Physical Education

Required outcome: The prison provides physical activities that meet the needs of the population including older women and women with disabilities.

Opportunities to engage in physical exercise should be made more readily available and should include an area for walking. Many women tend to increase their weight whilst in prison, which further damages their level of self-esteem.

It is well known that exercise helps with mental health issues. As women prisoners of all ages and abilities suffer from this disproportionately, we recommend the Prison Service considering offering prisoners' access to swimming at a local venue, or a venue such as the JJC. This could be linked to an incentive scheme.

6.3 Property and clothing

Required outcome: Prisoners have access to suitable clothing throughout their sentence. A volumetric control policy is in place and well advertised throughout the prison. Lending or borrowing other prisoners clothing or property is not permitted.

The importance of personal appearance is acknowledged, so the provision of clothing on reception should ensure a reasonable degree of choice for individuals who do not have access to resources outside the prison. For example, for those serving longer sentences, it should be possible for them to purchase clothes directly using a catalogue.

6.4 Hygiene

Required outcome: Women are provided with the necessary means and provisions to maintain their own hygiene and personal care.

NIACRO welcomes the emphasis on empowering women to maintain their own personal care through provisions and also with appropriate support and help for those experiencing difficulty in this area.

6.5 Environment

Required outcome: The prison's physical environment is conducive to women prisoner's health and well-being.

It should be acknowledged at the outset that the prison environment is generally not conducive to any prisoner's health. Therefore, it is important to have standards to reduce the negative impact on the individual. In developing gender-specific standards for women, we must seriously question the need for a physical environment within which prisoners are unable to walk unescorted to where they need to go, such as to a visit or training and education facilities.

Further, NIACRO recommends that the Prison Service undertake an investigation to ascertain whether cell space is conducive as possible to health and well-being, particularly where sanitary arrangements are in close proximity to the bed.

Creating a positive physical environment must take account of research findings from elsewhere such as Canada, presented at the Hillsborough conference on women offenders in 2004. This work clearly challenges our traditional perception of prison design, which remains based on concepts from the Victorian era.

6.6 Diet

Required outcome: The specific dietary requirements of the female population, including foreign national women, those with religious or cultural requirements, pregnant women or nursing mothers or those on a medical diet should be met.

NIACRO welcomes the acknowledgement of the range of dietary needs associated with the different groups of women prisoners. Evidence suggests that empowering women to take responsibility for what they eat, in a similar way to being in control of their personal hygiene, contributes significantly to their self-esteem and general health.¹

NIACRO recommends that women should be facilitated to prepare their own meals and supported to establish and maintain a healthy eating regime. Obviously those who suffer eating disorders need appropriate therapeutic interventions, but removing responsibility for food preparation is not helpful to the majority of women in prison.

6.7 Association activities

Required outcome: Association activities are designed to meet the needs of women prisoners- particularly those with vulnerabilities.

NIACRO acknowledges the commitment to carrying out a survey of the views of women prisoners twice yearly. However, given the significant turnover of women serving short sentences/on remand, few would have the opportunity to actively influence the activities available to them for association time.

It is important that women in prison have a mechanism to share views on such issues, such as that provided by a prisoner council or forum. Association time would also present opportunities for individuals to explore/attend support services offered by the voluntary and community sector in the community during evening times, which often encourages positive lifestyle choices.

6.8 Faith and religion

Required outcome: Women prisoners are actively encouraged to practice their chosen religion fully, and in safety, whilst in custody.

NIACRO believes that “fully” should be defined to include regular attendance at appropriate services as well as observing days of religious significance.

¹ Journal of Epidemiology and Community Health, N. Douglas et al ‘The impact of imprisonment on health: what do women prisoners say? Issue 63, 29 April 2009

6.9 Tuck shop

Required outcome: The tuck shop should stock a wide range of products that reflect the diverse needs of the female prisoner population.

Given the reliance that prisoners have on being able to purchase what they need through the shop arrangement, NIACRO welcomes the commitment to making a range of goods available to meet individual needs and facilitating the purchase of items not available in the shop.

The term “tuck shop” has long been part of prison culture. However, NIACRO recommends that it is time to rename and develop the resource. For example, a permanent prison shop should be established offering training in a range of retail skills. In addition, the cost and choice of items needs to be monitored relative to what is available out in the community so that prisoners are not at an unfair disadvantage.

6.10 Complaints and requests

Required outcome: Women prisoners are aware of the complaints system and how it operates.

We agree that women prisoners are more likely to “seek to resolve problems quickly with staff they know”, than make a formal complaint. Not only is this a “normal” response, but it should be encouraged, as problem solving skills are essential in families and in the community.

NIACRO strongly advocates establishing a prisoner council in the women’s prison. There are many examples outside Northern Ireland where such councils work effectively for the benefit of all concerned.²

7. Security

7.1 Required outcome: Security and good order are maintained through positive staff-prisoner relationships based on mutual respect as well as attention to physical and procedural matters.

NIACRO questions why a Level 1 search should require a woman to remove all clothing with the exception of underwear. It is possible that a Level 1 search should not involve the removal of any clothing.

NIACRO recommends the writing of gender-specific rules should explain the rationale for this level of search and be subject to questioning by key stakeholders.

² Prison Reform Trust, Having their Say, 2004. www.prisonreformtrust.org.uk

7.2 Required outcome: Women prisoners are searched, with dignity and respect, in accordance with the revised full search procedures for women prisoners. Women are not required to remove their underwear unless necessary on the grounds of reasonable suspicion or intelligence received.

Explaining the search procedures in advance is important. In particular, women should be aware of the grounds necessary for any request to remove underwear, before that request is made.

7.3 Required outcome: A prisoner in a mother and baby room is required to consent to the searching of her baby.

Whilst NIACRO recognises that the mother's consent is required to carry out a search of a baby, clarification needs to be given that this would only be done in very exceptional circumstances. Examples of such circumstances should also be given.

7.4 Required outcome: Women prisoners are searched with dignity and respect in accordance with religious or cultural needs.

NIACRO welcomes this guideline.

8. Managing Order

8.1 Required outcome: Use of force should only be considered as a matter of last resort when all other methods to de-escalate the situation have failed, or would be judged to fail, in the prevailing circumstances.

Physical force may be necessary in some situations. NIACRO agrees that only female staff should be involved in the use of control and restraint techniques if and when these become necessary.

However, the term protective clothing should be clarified, particularly given that anyone at risk of harming themselves or others can be monitored safely. NIACRO would query any circumstances in which a woman's clothing would have to be removed

8.2 The adjudication process is applied in accordance with the NIPS Adjudication Manual. Penalties awarded should be commensurate with the offence committed.

Penalties in prison are about loss of privileges, which can have enormous impact on the individual, such as the loss of the telephone to contact family. It is therefore within the very unique situation of imprisonment that a judgement about the penalty being "commensurate" with the offence is made.

NIACRO would advocate a more positive system – using restorative approaches – which assist the person concerned to understand the full impact their actions have had on other prisoners and staff. More importantly, it will

provide the prisoner with the opportunity to make amends through some positive actions.

8.3 Women who need “time out” to calm down should be encouraged to communicate this to staff and appropriate facilities, short of confinement to cell, should be made available.

Where women find themselves living together and subject to a highly controlled environment, it is inevitable that individuals will require “private space” from time to time, and in particular, following an incident. At particular times of the day, such as meal times, seclusion should be an option available to women on request. This would overcome the concern that a prisoner might deliberately “act in an anti-social way in order to achieve seclusion”.

9. Offender Management

9.1 Required outcome: Arrangements are in place to address the offending behaviour needs of the women prisoners.

As in the community, the needs of women who offend are complex and multi-faceted. Allocation of a dedicated Sentence Manager and Case Manager will help focus on the opportunities she has during sentence to prepare for her release. However, it is not clear if this arrangement will also apply to the many women passing through custody on remand or serving shorter sentences (less than one year) and how it is proposed their offending behaviour needs are addressed.

Critically, the building of self-esteem and empowering women to take control of their lives is difficult to achieve in the prison setting. However, some commitment should be made here to linking with the community aspect of the strategy for working with women offenders³. This includes programmes delivered to women, which can make a difference to their lives and to their risk of re-offending.

10. The Resettlement Pathways

10.1 Accommodation

Required outcome: The Prison Service works in partnership with a wide range of statutory and non-statutory agencies to deliver programmes and services to re-integrate women prisoners back into the community and reduce the likelihood of re-offending.

All prisoners accommodation needs and risk of homelessness are assessed on committal and again prior to release.

³ NIO – Draft Strategy for the Management of Women Offenders in Northern Ireland, February 2009

NIACRO believes the matter of accommodation is fundamental to re-integration and that for women, it is particularly difficult to obtain suitable accommodation and set up home on release. Standards should reflect a commitment not only to assessing the 'risk' of homelessness but to addressing the causes of homelessness in partnership with other relevant agencies.

NIPS may also consider making a commitment to offering training to women as peer advisors on these issues. NIACRO would suggest a scheme similar to that which is in place in Maghaberry on housing advice.

Women who have served long/life sentences should have real opportunities to earn and save money to pay deposits and purchase essential furnishings on release. Grants should be made available. There should not solely be a reliance on charitable donations for basic furniture.

10.2 Education, training and employment

Required outcome: The Northern Ireland Prison Service works in partnership with a wide range of statutory and non-statutory agencies to deliver programmes and services to re-integrate women prisoners back into the community and reduce the likelihood of re-offending.

NIPS recognises that education and training should be relevant to the employment opportunities in the community and should be delivered in conjunction with outside agencies and employers.

NIACRO welcomes the strengthening focus on training related opportunities for women prisoners. It is important that NIPS use models that encourage individual progression from basic personal development activities through to certified vocational courses. This will ultimately assist women to gain the confidence they need to access mainstream provision.

It is imperative that women prisoners consider options for employment as early as possible into sentence. Consideration must be given to educational abilities and work history experiences to create individual realistic and relevant educational/vocational/employment plans. Women must be provided with advice and guidance regarding the relevance of their convictions to career paths. This should be supported with advice and guidance on disclosing convictions – and developing the relevant communication skills to do so.

NIACRO supports the proposal to link education and training opportunities in custody to labour market needs. Information on labour market trends and skills shortages could/should be informed by NIACRO's work with employers in order to develop appropriate opportunities for women pre and post release.

In order to ensure meaningful gender specific standards, it is critical that women are not denied education / training opportunities on the grounds of insufficient numbers. Similarly it is important that opportunities to experience

real work environment are developed and encouraged either through structure of work days in prison or work experience as part of a working out strategy.

10.3 Health – mental and physical

Standards being agreed between SE Healthcare Trust and NIPS.

It is regrettable that standards for healthcare – central for the well-being of women in custody – are not available as part of this consultation.

There should be evidence of communication and co-operation between healthcare and prison service for the benefit of the prisoners.

10.4 Alcohol and substance misuse

Standards being agreed between SE Healthcare Trust and NIPS.

NIACRO is concerned that the new arrangements for interventions to address alcohol and substance misuse do not provide a seamless transition from custody to community in respect of support and follow-up. We recommend that services which provide connections are implemented as a priority, in order to assist those in the community who require interventions beyond the prison walls. This group is particularly vulnerable to re-offending.

10.5 Finance, benefits and debts

Required outcome: The Prison Service works in partnership with a wide range of statutory and non-statutory agencies to deliver programmes and services to re-integrate women prisoners back into the community and reduce the likelihood of re-offending.

NIACRO welcomes the commitment to providing training in money management within the timetable of programmes available during the prisoners' day.

NIPS should consider making a commitment to offering training to women as peer advisors.

10.6 Children and Families

Required outcome: The Prison Service works in partnership with a wide range of statutory and non-statutory agencies to deliver programmes and services to re-integrate women prisoners back into the community and reduce the likelihood of re-offending.

Women prisoners are able to access support and advice to help them manage family issues, particularly those regarding children, while they are still in custody.

Retaining links with their family is crucial to the well-being of women prisoners.

NIACRO welcomes the guidelines in respect of visits, as we believe women in prison should always be able to have physical contact with their children.

However, women can be placed on closed visits because they have breached security rules and in such circumstances they would not have physical contact with their children.

NIACRO's concern is that closed visits can be imposed on a prisoner even when it is their visitor who breached the security rules. In such circumstances, we believe that it is the individual visitor who should be penalised - not the prisoner and her children. In cases where the prisoner herself has breached security, closed visiting arrangements should only be imposed in specified circumstances. Further, prisoners should be made aware what these circumstances are.

There should also be a commitment by NIPS to offering "child centre visits" to all women in custody.

NIACRO' Family Links currently work with families in the community to maintain contact with prisoners. We acknowledge women are likely to have particular needs in respect of their families and children. Maintaining family contact can often present great difficulties when the mother of children is prison. The Assisted Prison Visits scheme does begin to address this issue by offering financial assistance to families as a contribution towards the cost of travel to the prison. This often works extremely well and is a welcome and vital service. However in more complex cases, such as mothers who are in prison, the scheme falls short. For example, in order to qualify, the carer of children needs to meet strict criteria.

There are a number of women that are estranged from their partners who are often the father and carer of their children. The partner may not willing to visit the woman in prison (for a number of reasons) so the children are prevented from visiting their mother, because the Assisted Prison Visit Scheme does not extend this benefit to the children in their own right.

In the case where partner are estranged and the children do not have access to transport from a person that meets the criteria for Assisted Prison Visits, they are then unable to take advantage of child centred visits at the prison because they are unable to get there in the first place.

In addition the children of women prisoners can often end up in the care system. They too are unable to access financial assistance towards transport to the prison because the Assisted Prison Visits Scheme does not apply to children in their own right.

NIACRO' Family Links works closely with Assisted Prison Visits Scheme to provide volunteer drivers to families that qualify under this scheme; however we are unable to provide volunteer drivers to children that find themselves in this situation.

NIACRO recommends changes are urgently made to the criteria for awarding Assisted Prison Visits so that children of women in prison can maintain contact with their mothers.

10.7 Attitudes, Thinking and Behaviour

Required outcome: The Prison Service works in partnership with a wide range of statutory and non-statutory agencies to deliver programmes and services to re-integrate women prisoners back into the community and reduce the likelihood of re-offending.

Women are assessed for, and are able to access, appropriate offending behaviour programmes to meet their needs.

Standards should reference the Women Offenders' Strategy in the community as programmes developed to meet the needs of these women may also be suitable for delivery in the prison. In addition, standards should include a commitment to obtaining feedback from the women who complete programmes and give weight to their opinions, as part of an independent evaluation process. The success of any programmes can only be judged in the context of a holistic approach to re-integration post-release.

10.8 Supporting women who have been abused, raped or suffered domestic violence

Required outcome: The Prison Service works in partnership with a wide range of statutory and non-statutory agencies to deliver programmes and services to re-integrate women prisoners back into the community and reduce the likelihood of re-offending.

10.9 Women prisoners who have been abused or subject to domestic violence are able to access appropriate support and advice.

Womens Centres in the community are referenced in this section about abuse and domestic violence. These centres have a wide range of interventions suitable for meeting the needs of women. However, there are specialist organisations such as Women's Aid, which should feature in this section. In reality, such services are under resourced and there can be long waiting lists. NIPS should work with other departments to ensure adequate provision of services available from custody to the community. This should include psychotherapy; assertiveness training; for women in prison and on release

10.10 Supporting women who have been involved in prostitution

Required outcome: The Prison Service works in partnership with a wide range of statutory and non-statutory agencies to deliver programmes and services to re-integrate women prisoners back into the community and reduce the likelihood of re-offending.

Women who have been involved in prostitution are able to access appropriate help and advice.

Again, Women's Centres are referenced here as offering a solution in terms of "resources and multi-agency support". Whilst the centres offer a valuable range of services, providing opportunity for women to grow personally and to

change their lifestyles, this can only be achieved if all “pathways” are addressed simultaneously for those in custody and post-release.

11. THE NEEDS OF PARTICULAR GROUPS

11.1 Foreign nationals

Required outcome: The needs of foreign national women are identified, understood and addressed.

11.2 Black and ethnic minority groups

Required outcome: The different needs of women from black and minority ethnic groups are identified, understood and addressed.

NIACRO welcomes the commitment to addressing the needs of foreign national women and women from black and ethnic minority groups in custody, including staff training in cultural awareness. Such training should include information about the exploitation of women.

Services must also take account of the level of vulnerability of some of these women, beyond that of their foreign national status. They may have experienced very difficult circumstances in their home country and have suffered loss of contact with children and family members. The Prison Service should seek to identify and make available therapeutic services for these women while they are in custody, as well as addressing their practical needs.

11.3 Life sentence prisoners

Required outcome: The needs of women prisoners serving indeterminate sentences are assessed and addressed.

Standards for women serving life sentences must ensure that individuals, based on their assessment, should experience a progressive regime in preparation for release. There must be opportunity for women to earn and save; to obtain employment skills; to take control of their own lives by addressing, as far as possible, the negative impact of institutionalisation.

Women should be able to access services in the community well in advance of release and prepare suitable accommodation (receiving financial assistance to get furniture, etc.) NIACRO and other voluntary/community sector partners can support this process, through assisting in the development of proper resettlement systems. Such organisations are willing to undertake independent evaluation to alleviate concerns regarding the use of grant aid.

11.4 Young women

Required outcome: Young women prisoners are supported with regard to self-harm, mental health, substance misuse and experiences of abuse and domestic violence.

There is real opportunity to engage with young women in custody who have multiple problems. Every effort should be made during their sentence, to allow young women to avail of therapeutic interventions, develop insight into their behaviour/addiction and make it possible to help them to link with services directly in the community prior to their release. NIACRO is committed to such an approach, to co-ordinating plans on release and to the involvement of trained mentors.

11.5 Older women

Required outcome: Staff and managers are aware of the specific problems that older women and their visitors may face.

Given that the different needs of older women are recognised, prison rules should be flexible enough to respond to some of those needs – by allowing older women more access to individual space.

11.6 Women with disabilities

Required outcome: Women prisoners with disabilities have their individual needs addressed.

Staff need to be provided with guidance in respect of responding to specific disabilities and how the person might be affected. Guidance should include information, so that staff are particularly sensitive to the difficulties someone may face, such as a prisoner who has a recurring condition, which deteriorates and makes walking difficult.

12. Mother and Baby

Required outcome: Pregnant women or women with babies or young children can apply to have their child with them in custody.

Staff working with mothers and babies are appropriately trained.

During pregnancy, it is essential that women have the opportunity to choose suitable clothing for themselves. In circumstances where the person has no personal or financial resources able to provide for her, the Prison Service must make provision.

The criteria for refusing a mother and baby place to a prisoner needs to be made public, alongside the arrangements for any appeal of that decision.

13. Management Issues

Required outcome: The different management issues involved in running women's prisons are understood and addressed.

The deployment of suitably trained male staff is an important aspect of the management of women prisoners. Given the level of vulnerability of many of the women in custody, there should be close supervision of all staff.

In addition, NIACRO recommends the setting up of a Prisoner Council to monitor and provide feedback on the operation of standards. It is also important that the roles of bodies such as the Independent Monitoring Board, Chaplains and the voluntary sector service providers are all utilised to open up communication and improve the opportunities of individual women prisoners to address their difficulties and prepare effectively for their release.

14. Training and Support for Staff

Required outcome: Staff are given the necessary training and are provided with the care, support and supervision to enable them to perform their duties in accordance with the gender-specific standards and policies that apply to the women's prison.

Reference is made throughout the standards to the need for specific training of staff. Undoubtedly a great deal of experience is available within NIPS and the proposed outline of training is very relevant. The impact of training on staff will be influenced by the culture in which they operate and in any institution, the culture can easily become restrictive and inflexible. NIACRO recommends the training should include involvement with the arrangements for the out-workings of the "Strategy for working with women offenders" in the community, which is led by Probation Board and the voluntary and community sector. Regular staff exchanges between the prison and the community services should also be considered for introduction.

CONCLUSION:

NIACRO recognises the work and commitment of the Prison Service to look at existing arrangements and introduce general standards for women prisoners.

However, we urge the Prison Service and Government to take this unique opportunity to bring some fresh consideration to best practice in the imprisonment of women. This is now a key opportunity to rethink how women should be treated in a custodial setting.

October 2009

Amended January 2010