

Inspection of Approved Premises

July 2008

Criminal Justice Inspection
Northern Ireland
a better justice system for all





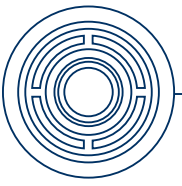
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July 2008

Presented to the Houses of Parliament by the
Secretary of State for Northern Ireland under
Section 49 (2) of the Justice (Northern Ireland)
Act 2002.

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List of abbreviations

ACE	Assessment, Case Management and Evaluation process
AP	Approved Premises
ASORMC	Area Sex Offender Risk Management Committee
CJI	Criminal Justice Inspection Northern Ireland
CSOGP	Community Sex Offender Groupwork Programme
DRM	Designated Risk Manager
Extern	A voluntary organisation which provides services to offenders
IO	Investigating Officer
ISU	PBNI's Intensive Supervision Unit
LSRC	Life Sentence Review Commissioners
MASRAM	Multi-Agency Sex Offender Risk Assessment and Management
MUST	MUST Association for the Single Homeless
NIACRO	Northern Ireland Association for the Care and Resettlement of Offenders
NIHE	Northern Ireland Housing Executive
NIO	Northern Ireland Office
NIPS	Northern Ireland Prison Service
NISCC	Northern Ireland Social Care Council
NISOSMC	Northern Ireland Sex Offender Strategic Management Group
OBP	Offending Behaviour Programme
PBNI	Probation Board for Northern Ireland
PBSW	Presbyterian Board of Social Witness
PSNI	Police Service of Northern Ireland
SLA	Service Level Agreement
SP	Supporting People
ToR	Terms of Reference
TSA	The Salvation Army
VCS	Voluntary and Community Sector
YOC	Young Offenders Centre

Definition

Approved Premises: “Hostels which receive Supporting People funding specifically for offenders, allocate bedspaces for criminal justice referrals and apply PBNI Standards.”



Chief Inspector's Foreword

Criminal Justice Inspection Northern Ireland (CJI) was requested by the Secretary of State in September 2006 to assume responsibility for the inspection of "probation and bail hostels," under Section 47(4) of the Justice (Northern Ireland) Act 2002 and Section 14 of the Probation Board (Northern Ireland) Order 1982.

Northern Ireland is unique in that all its hostels that accommodate offenders – properly known as approved premises (APs) – are provided by voluntary and community sector (VCS) organisations, a situation that has arisen more by accident than design over the past three decades. The APs nowadays are required to specialise in dealing with offenders who require enhanced supervision, rather than providing for the general homeless population. While some commentators might suggest that these offenders should be entirely confined to the premises, Inspectors are clear that APs cannot, and should not replicate prison in the community. Their main role is to assist the assessment and management of risks posed by offenders once courts and other criminal justice agencies have decided they should be allowed their liberty.

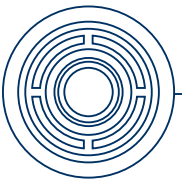
The main focus of this inspection was on how well the APs fulfil their risk assessment and management role. We also examined arrangements for governance of the APs, though dwell less on this topic since the Northern Ireland Housing Executive (NIHE) undertakes a detailed scrutiny of governance matters as part of their accreditation process. Ours was primarily an inspection of collective AP performance rather than of individual facilities, though we also make specific comment where appropriate.

CJI has previously identified the important role that is fulfilled by the APs in our reports on the multi-agency sex offender risk assessment and management (MASRAM) process (March 2005, December 2006 and November 2007); and on the contribution of the VCS to the criminal justice system (November 2006).

The inspection was undertaken in September 2007, led by Tom McGonigle of CJI. The approved accommodation providers and their statutory partners provided all information and assistance requested, for which I am grateful. We will be initiating a programme of regular, small scale inspections of the APs; and will follow up with a full inspection in three years time. That inspection will revisit the key theme of risk management, and will also consider other themes such as APs relationships with the local community.



Chief Inspector of Criminal Justice
in Northern Ireland
July 2008





Executive Summary

This inspection confirmed that the six approved premises (APs) in Northern Ireland provide an important public safety service by enhancing the supervision of up to 76 offenders at any point in time. The structures within which they operate and engage with statutory partners are largely effective. It is particularly noteworthy that each AP has developed good operational links with their local police service.

Current AP locations have been determined by local voluntary sector initiatives over the past 30 years. They do not afford an even geographical spread, with two located in rural towns and the other four unevenly distributed in Belfast. This can lead to clustering of offenders after they leave the APs. While the criminal justice agencies and Northern Ireland Housing Executive (NIHE) have plans to address this problem it will be some time before any impact might be noticed.

The roles of APs have changed significantly during the past 30 years. All of them recognise that public protection has become core to their business, and they have made adjustments in response to the changing requirements of criminal justice agencies. The demands of accommodating high risk, high profile offenders have generated considerable pressure for AP staff and managers, and some cope better than others.

Inspectors identified that an unspoken hierarchy has evolved between the facilities. There is differentiation in the levels of risk that they are prepared to manage, and the quality and volume of offender assessments that they undertake, but this has not come about through planned development.

We make a total of 19 recommendations. Our key recommendation is that each AP should prepare a statement of purpose in consultation with service commissioners. These statements of purpose should complement the accommodation strategies of the Probation Board for Northern Ireland (PBNI) and the Northern Ireland Sex Offender Strategic Management Committee (NISOSMC).

Another four recommendations are directly associated with the key recommendation. If implemented, these should ensure that future development of APs will move forward in a more planned fashion, taking account of imminent developments such as increased inter-agency risk management of violent offenders and the needs of female offenders.

In terms of governance, Inspectors found that the six APs could broadly demonstrate the appropriate procedures, structures and accountability mechanisms that would be expected of small and medium voluntary sector providers. These included clear roles and reporting lines for managers and staff, appropriate interfaces with partner agencies and funders, relevant policies and a range of internal and external scrutiny arrangements.



Risk management is taken very seriously by all the APs, and Inspectors saw some good practice in managing extremely difficult people. The quality varied however, and one facility requires more work to improve aspects of its performance in this respect.

A particularly important decision is required about provision for high risk offenders. If this proceeds then careful consideration is required about ramifications for the current AP estate, and the management arrangements that would apply to any new provision.

In order to maximise usage of the scarce AP resource it is also important that criminal justice agencies and the NIHE continually encourage the wider spectrum of accommodation providers to consider homeless offenders who are not assessed as posing a significant risk and therefore do not require supervised accommodation.



Recommendations

Key Recommendation

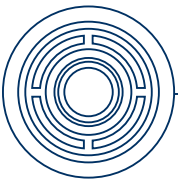
- **Within the context of current strategic accommodation reviews each AP should devise a statement of purpose in consultation with the commissioners of their service – PBNI, NIHE and the Northern Ireland Prison Service (NIPS). AP funding levels should also be reviewed and henceforth related to the new statements of purpose (paragraph 2.16).**

Associated Recommendations

- The PBNI and NISOSMC accommodation strategies should cross-refer to the APs' statements of purpose (paragraph 2.22).
- A review of current AP staffing profiles - numbers, grades and qualifications of staff - and future requirements should be a priority consideration in preparing the APs' statements of purpose (paragraph 3.4).
- A minimum specification should be agreed by commissioners and providers to articulate the physical security requirements of each AP. This should be linked into their statement of purpose (paragraph 3.10).
- File recording standards should be developed and implemented across the AP estate in order to ensure uniformly high quality practice. These standards should be articulated in the statement of purpose drawn up by each AP (paragraph 3.22).

Other Recommendations

- A staff rotation policy should be developed and implemented by each of the APs (paragraph 2.6).
- The remit of the AP managers' forum should extend to incorporate senior managers on a regular basis, and to address key strategic issues as well as operational matters (paragraph 2.19).
- The commissioning agencies should approach the NIO and health providers to provide funding for APs (paragraph 3.15).
- Terms of Reference (ToR) should be devised for the weekly allocation meeting. These ToR should take account of AP statements of purpose, and should include rotation of duties and ensure attendance of deputies when managers are unavailable (paragraph 3.29).

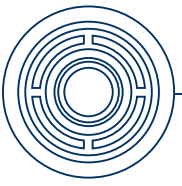


- The partner agencies should consider the merit of appointing an independent chair for the allocation panel, whose role could extend to chairing the bi-monthly managers forum, contribution to the proposed move-on arrangements and ensuring effective liaison between commissioners and providers (paragraph 3.29).
- The commissioning agencies and APs should continue to seek support from statutory mental health services, and in their absence, explore the opportunity for partnership with a voluntary organisation to support the care and management of AP residents who require mental health support (paragraph 3.30).
- AP referral documentation should be amended to explicitly convey information about applicants conduct while in custody and other relevant personal information (paragraph 3.36).
- The NISOSMC should address the issue of minute circulation in conjunction with the APs and Designated Risk Managers (paragraph 3.42).
- Subject to satisfactory outcome of the current pilot project, alcohol testing should extend to all APs, and drug testing should be introduced where necessary (paragraph 3.47).
- PBNI should review its out-of-hours contact and standby arrangements (paragraph 3.50).
- Each AP should be subject to regular formal monitoring by its parent body or management committee, and this monitoring should incorporate a written report to the full management body (paragraph 3.51).
- Police should use their powers of arrest under Article 6 of the Criminal Justice (NI) Order 2003 when AP residents breach bail requirements (paragraph 3.55).
- Each AP should agree a clear protocol for evictions with the PBNI, and include other relevant agencies such as the PSNI and NIHE in the design and delivery of this protocol. It should identify that public protection is the priority, include a range of options for move-on, and ensure ready access to PBNI support in keeping with our recommendation at paragraph 3.51 (paragraph 3.56).
- We recommend the debate about new provision should be formally initiated by PBNI, NIHE and the NIPS. The debate should incorporate current AP providers and their commissioners, as well as other stakeholders, and should synchronise with current accommodation reviews and statements of purpose (paragraph 4.5).

Section



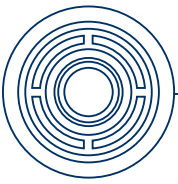
Inspection Report



Introduction



- 1.1 Approved premises in the UK were traditionally used in the past to accommodate homeless offenders, but in recent years their role has shifted significantly to enhance the supervision of higher risk offenders. Several of those who require enhanced supervision are high profile and demanding offenders. They seldom choose to live in APs; rather they are required to reside there by the courts in order to help assess and manage their behaviour. Consequently the AP function is sensitive and they can provide challenging working environments for staff.
- 1.2 The Probation Inspectorate undertook a thematic inspection of offender accommodation in England and Wales in 2005. It demonstrated a markedly higher rate of reconviction among offenders who had accommodation needs (29.6%) than those in the general probation caseload (19.6%). At the same time it showed a much lower rate of reconviction by offenders while they were living in approved premises (3.1%) than by offenders who accessed mainstream accommodation services (36.6%). These outcomes indicate the contribution of APs to reduce crime and protect the public. It may be useful to have a similar study undertaken in Northern Ireland in order to assess the local benefits of APs.
- 1.3 There are six PBNI-approved premises in Northern Ireland:
 - TSA Centenary House;
 - Dismas House;
 - Edward Street Hostel Ltd
 - Innis Centre;
 - MUST Association for Single Homeless (MUST); and
 - Thompson House.
- 1.4 All six APs are run by Voluntary and Community Sector (VCS) organisations, unlike the rest of the UK where there is a mixed economy with both PBNI and VCS providing offender accommodation. The situation in Northern Ireland has evolved rather than been deliberately created, and there is ongoing debate about whether a statutory criminal justice organisation should directly own and manage a facility in Northern Ireland.
- 1.5 Three of the Northern Ireland APs accept referrals exclusively from criminal justice agencies – PBNI makes these referrals on behalf of itself and the Northern Ireland Prison Service (NIPS). The other three APs operate direct access arrangements



and accommodate non-offenders as well as offenders. Every offender who takes up residence in an AP must be allocated a supervising probation officer, whether or not they are subject to statutory probation supervision.


- 1.6 Table One reflects the differentiation between facilities in terms of their management arrangements (local committee or headquarter organisation), capacity, access criteria, accreditation status and date, plus levels of Northern Ireland Housing Executive (NIHE) funding (rounded figures).
- 1.7 The APs are primarily funded by the NIHE's Supporting People (SP) and Housing Benefit (HB) arrangements. NIHE reports that the costs outlined in Table One are expensive in comparison to other residential providers. Table One demonstrates that widely-varying amounts are provided to each AP. The funding differences are based on factors such

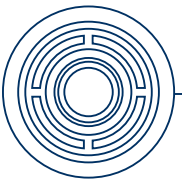
as numbers and qualifications of staff, location and size of premises.

- 1.8 Apart from the possibility of a new statutory facility, expansion of the AP estate is not currently envisaged by any of the criminal justice agencies. However this is contingent on better planning of post-custody accommodation for some offenders, either to divert them from APs, or to move residents out of APs more promptly. NIHE and PBNI are currently working with the VCS to extend access to homeless provision and floating support services which can help offenders maintain their own accommodation. In addition the 2007 Criminal Justice (Northern Ireland) Order will provide new indeterminate and extended custodial sentences for dangerous offenders. If parole commissioners require these prisoners to be accommodated in a structured environment as a condition of their release, then there may well be increased demand for AP places.

Table One

	TSA Centenary House	Dismas House	Edward Street	Innis Centre	MUST Hostel	Thompson House
Type	HQ	HQ	LC	HQ	LC	HQ
PBNI referrals/ Total capacity	13/118	14/14	8/29	20/20	6/20	15/15
Access/criteria	Direct	Offenders only	Direct	Offenders only	Direct, including females	Offenders only
NIHE date accredited	March 2006	March 2005	April 2005	March 2005	May 2005	May 2006
NIHE funding per resident/week	£200	£670	£298	£723	£396	£478

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- 1.9 In addition to the funding outlined in Table One, APs may receive small amounts from PBNI and charitable fundraising. The annual average cost of each offender AP place is £25,000 - cheaper than imprisonment (£86,000 per annum) but more expensive than ordinary probation supervision (£2,900 per annum).
- 1.10 Receipt of NIHE funding means that the APs are subject to NIHE accreditation. This accreditation lasts for three years. It addresses governance matters in detail and requires that providers:
- are financially viable;
 - have competent administrative procedures;
 - have effective employment policies;
 - have sufficiently robust management procedures; and
 - are able to demonstrate a track record of competence to deliver services.
- 1.11 In addition the APs are subject to detailed standards that are agreed with, and monitored by PBNI. These standards deal with offender management, both by AP staff and by referring probation officers.
- 1.12 The demand for, and usage of approved accommodation in Northern Ireland during April 2005 – March 2007 is reflected below.
- There are an average 76 bedspaces available in the approved premises every night, and over 800 different offenders reside in them during the year. The average length of stay is 3½ months, with a range of one day – two years.
 - 50% of residents are Schedule One offenders and 20% are violent offenders.
 - An average 14% of residents are inescapable voluntaries i.e. people for whom PBNI has no statutory responsibility nor funding, but who engage voluntarily with a probation officer to address factors that contribute to their offending while they are living in the AP.
 - In 2005-06 the overall occupancy level was 74%. This reduced to 69% the following year. The void rate is mainly due to bedspaces being held over for people who are offered a place but do not arrive at the AP - e.g. due to being refused bail, or being refused home leave from prison.
 - During 2005-06 there was an average of 25 referrals per month, of whom an average of two were refused. A total of 223 people were admitted and 219 departed, of whom 39 were asked to leave.
 - In 2006-07 the referral rate increased to an average 29 per month, of whom an average of two were refused. There were 191 new admissions and 226 departures, of whom 23 were asked to leave.
 - Whilst bailees comprise an average 43% of referrals, they only average 14% of actual residents. This causes an unnecessarily high level of void bedspaces when places are offered to bailees but not taken up, and significant wastage of resources in assessing bail applications.



CHAPTER 2:

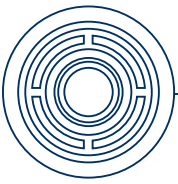
Governance



- 2.1 CJI does not interpret corporate governance narrowly as financial checks and balances, independent audit arrangements and so forth but more widely as the whole set of arrangements for the good strategic management of the organisation. We sought in this inspection to check that those arrangements were such as to ensure not just that things did not go wrong in the APs, but that they positively supported good planning and performance management.
- 2.2 CJI looked at the structures and functions of the APs, and the relationships between management committees, the management, the staff and the commissioners (the NIHE, PBNI and NIPS) to see that they were clear and fit for purpose. We also sought evidence that the actions and behaviours of all parties were constructive and cooperative, working in the best interests of the public protection.
- 2.3 The NIHE's SP Branch reported that they were satisfied with the performance of five APs, but had concerns about Thompson House. This was primarily because its occupancy levels had been low (66% during July 2006 – July 2007), although the Presbyterian Board of Social Witness (PBSW) never had any concerns about financial viability, and has always been fully committed in every sense to the work of Thompson House. They attributed low occupancy to staff shortages, and ongoing recruitment and retention problems which had led them to cap the number of referrals they could accept at holiday times. This in turn caused practical difficulties for the referral panel that meets weekly to allocate placements, as well as reducing confidence among statutory partners. Thompson House is working with SP and other agencies to address these matters.
- 2.4 Inspectors saw evidence of good practice by APs in dealing with improper staff conduct, which led to suspensions when necessary, as well as proceedings by the Northern Ireland Social Care Council (NISCC) to assess fitness to practice in one particular case. These are the types of action that should properly take place when a member of staff breaches professional boundaries, and indicate that governance is working properly.

Structure and oversight

- 2.5 Four of the APs belong to large parent organisations: the Innis Centre and Dismas are part of the Extern



organisation, Thompson House belongs to the PBSW, and Centenary House to The Salvation Army. Edward Street and MUST are overseen by independent local management committees.


2.6 Each AP, with the exception of MUST, is located within a wider organisational framework which could afford staff the opportunity to rotate duties. However apart from natural wastage, Inspectors did not see evidence of staff rotation in any of the APs, and some situations were noted where staff were not performing to best effect. Rotation – or inter-agency placements and secondments – can help keep residential staff refreshed and prevent them from becoming institutionalised. While recognising the contractual issues, limitations and costs associated with rotation **we recommend that a staff rotation policy should be developed and implemented by each of the APs.**

2.7 It can also be expected that headquartered APs will benefit from corporate arrangements such as centralised policies and support from finance and human resources departments. This was generally the case, though the increasingly specialist and demanding nature of accommodating offenders is a growing challenge for some APs.

2.8 Inspectors were impressed with governance in the MUST hostel especially with the arrangements to engage the local community which are important to help promote confidence in the criminal justice system.

- Board members are elected every year, maintaining a religious and gender balance and involving a range of relevant professions, including local business people;
- The Board meets monthly and are actively involved in the running of the facility. Boundaries between Board and Management are clear. Minutes are recorded and available to all staff and residents;
- There is a comprehensive risk register, incorporated within the 2004-09 Business Plan and a detailed staff handbook;
- Finance is subject to external scrutiny. An Annual Report and audited accounts are produced;
- Residents confirmed a firm and fair approach in MUST. They spoke highly of the service provided and the quality of the facility. They have a say in the running of the hostel and access to their personal files;
- Staff explained that they enjoy good opportunities for training, and Inspectors saw written evidence of regular supervision and annual appraisals.
- Communication is good with weekly team meetings, and daily written and verbal handovers.
- Staff corporate identity has recently extended to all staff wearing ID badges and uniforms, an initiative which is supported by staff and Board members.

2.9 Edward Street's management committee was also diligent in its duty of oversight, although it has only six members, not all of whom are active. Inspectors would therefore suggest the committee needs to expand its membership to involve



more members from the local community and engage a broader range of professional expertise.

- 2.10 There are wider benefits of belonging to a larger parent group, enabling initiatives by some of the APs to broaden the provision for their residents e.g. Extern links residents into their other programmes, such as Axis and Floating Support; and Edward Street has developed a stand alone training facility – Key 2 – and a floating support project which are well-used by its residents.
- 2.11 There is no formal differentiation between the six APs, nor are there explicit statements of purpose that outline their unique roles. Each AP now fulfils a rather different function from that initially envisaged when they were established, because they have evolved over time in response to demands from the criminal justice system. Some cope better than others with the pressures of managing high profile, difficult residents, and three of the APs now exclude certain categories of offender.
- 2.12 PBNI completed a review of the AP referral process in March 2007. The report, which made 23 recommendations found *“...a unanimous view that the current arrangements need overhaul. Particular spheres emphasised by PBNI staff were that clearer definition and communication are required, that PBNI as purchaser/provider should be clearer in determining who goes where i.e. the current arrangements are too democratic. From the hostel side, there is a view that there needs to be greater*

definition about what PBNI wants and who the hostels realistically can/cannot handle. Hostels feel strongly that there are too many loops in the system that pose significant management issues...”

- 2.13 In other words a strategy debate is required in relation to approved premises. This should address future configuration of the AP estate, taking account of a range of factors such as geographical location and the appropriate mix of offenders in each facility.
- 2.14 Whilst the offender accommodation system cannot be absolutely prescribed – and indeed needs to be flexible – it would undoubtedly be useful to have a degree of clarity about the attributes and capacity of each facility in relation to matters such as staff composition, location and manageable risk levels. This clarity could best be delivered by each AP preparing a statement of purpose which sets out the role they are able to fulfil.
- 2.15 Statements of purpose detail aims and objectives that set out how a provider will meet the standards required by their commissioners. They are therefore premised upon clear articulation of commissioners’ needs. A debate is required in the first instance between the commissioners of approved accommodation (the NIHE, PBNI and the NIPS), as the role of APs to provide oversight and enforce restrictions becomes increasingly important, yet does not fit comfortably with SP’s remit of meeting accommodation needs.



2.16 Core elements of a good statement would include detailed staffing and management arrangements, clientele, regime, risk management and health and social care provision. Many benefits should flow for everyone involved if clear statements of purpose can be developed, to articulate the differentiation and complementary nature of the six APs. An intrinsic element of the statements of purpose should be the support that APs require from their commissioners. **We recommend that within the context of current strategic accommodation reviews each AP should devise a statement of purpose in consultation with the commissioners of their service – the PBNI, NIHE and the NIPS. AP funding levels should also be reviewed and henceforth related to the new statements of purpose.**

2.17 It would also be useful if a broader range of non-specialist APs could be persuaded to engage with the criminal justice agencies to take lower risk offenders who cannot live at home, yet do not require the costly and scarce supervised arrangements that are provided by APs. This is a valid contention in terms of public protection, though it will remain an ongoing challenge for providers.

External interfaces

2.18 The small Northern Ireland jurisdiction assists communication between approved premises and their statutory partners. There is only one police service, one prison service and one probation service and all the key


players know each other well. The interface with probation is particularly important as PBNI refers and manages all cases that are referred from prisons as well as from the community. The most regular forum is a weekly referral panel which is chaired by a probation manager and attended by the six AP managers.

2.19 There is also an AP managers' forum which meets bi-monthly, chaired by a probation senior manager. The purpose of this meeting is primarily to discuss policy rather than operational matters. However, AP senior managers are not involved in this forum and there are issues which would benefit from their regular participation, even if they did not attend every meeting. **We therefore recommend the remit of the managers' forum should extend to incorporate AP senior managers on a regular basis, and to address key strategic issues as well as operational matters.**

NIHE

2.20 The NIHE practice in relation to offender accommodation has progressed considerably over the past five years. A senior manager represents NIHE strategic interests on the Northern Ireland Sex Offender Strategic Management Committee (NISOSMC) and chairs its accommodation subgroup, which also comprises representatives from a range of statutory and voluntary organisations including AP representatives.

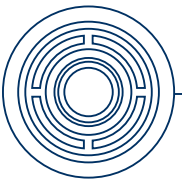
2.21 There is scope to improve the NIHE's response to the accommodation



needs of offenders and, to this end, two members of NIHE staff have been appointed. Along with other relevant agencies their role is to develop a case managed approach to assist individual offenders in temporary accommodation access permanent accommodation as close as possible to their areas of origin. This will involve developing closer links with local NIHE district offices and the Housing Association movements, particularly to ensure that access to accommodation is not unreasonably restricted. Links will also be developed with private sector landlords and consideration is being given to the development of a rent guarantee scheme for this specific client group.

tenancy support services to offenders who are in permanent accommodation, and intends to further expand this service.

- 2.22 The PBNI is currently reviewing its accommodation strategy, and NISOSMC is also preparing an accommodation strategy. These documents will make recommendations in relation to accessing temporary and permanent accommodation and the provision of appropriate support packages. The NIHE is playing a key role in the development of the strategies and is committed to making a major contribution to their implementation. These are important initiatives which should both be in place by spring 2008. **We recommend that the PBNI and NISOSMC accommodation strategies should cross-refer to the APs' statements of purpose.**
- 2.23 Besides its policy contribution and the SP financial provision outlined at paragraph 1.6, the NIHE also funds Extern for the provision of floating



Risk assessment and risk management

Five criteria were applied to assess the quality of risk assessment and risk management by the approved premises.

(a) Resources for high risk work

The AP has resources necessary to enable it to support the management of high risk of harm offenders.

- 3.1 The main resources that APs require are adequate staffing and suitable premises, both of which are primarily funded by the NIHE under two programmes: Housing Benefit and Supporting People.

Staffing

- 3.2 There are well-recognised difficulties for residential providers in recruiting and retaining staff who will work shift patterns, in a sometimes tense environment, especially if their qualifications enable them to work elsewhere. In the case of AP providers these difficulties can be exacerbated by the high profile nature of the job and the challenging behaviour of some residents. Gender balance within the staff group was reported as a particular concern for some APs when they are being asked to accommodate more high risk male residents.

- 3.3 While it is more expensive to employ

qualified staff, it was suggested to Inspectors that qualified staff are best equipped to undertake certain tasks such as risk assessment and case management. The Innis Centre is a relatively expensive facility, mainly because it employs relatively high levels of staff, several of whom are qualified social workers. It also imposes the least demand on staff in respect of residential duties: each social worker undertakes one sleep-in duty per week, and works one weekend in six. Yet the criminal justice system clearly benefits from this level of human resource investment as Innis accepts difficult residents and manages them well, and its staff undertake the majority of assessments on behalf of the allocation panel.

- 3.4 There are mixed views and ongoing debate about whether APs need to employ qualified social workers, and if so, to what extent. **We therefore recommend that a review of current AP staffing profiles – numbers, grades and qualifications of staff – and future requirements should be a priority consideration in preparing the APs' statements of purpose.**
- 3.5 There is an increasing range of pressures in managing a residential



workforce – e.g the European Work Time Directive restricts the duration of shifts, yet several staff told us of regularly working overtime and double shifts due to staffing shortages. Relief workers can assist, but they are not as familiar with residents or procedures, and can therefore only play a limited role. The requirement for managers to provide on-call support also means that they frequently work more than 40 hours per week.

- 3.6 While staff shortages are an issue for the APs, some view staff progression as positive and acceptable, a difficulty in the short term, but beneficial over time. Healthy levels of staff turnover can reduce known problems that arise in residential settings: institutionalisation, when workers can become less objective about offenders; unhealthy/collusive relationships between staff and residents; or workers treating the facility as their second home.
- 3.7 The APs apply different health and safety regulations in respect of their staff: e.g some have a mandatory policy that requires staff to carry panic alarms, whereas in others it is optional. Each position may be equally valid, but should be based on a rational assessment of risk. This issue could be usefully addressed in statements of purpose.

Premises

- 3.8 Most of the APs are former residential properties that were not designed with security in mind. Table Two sets out their main physical characteristics. Inspectors noted

wide variation in security provision across the AP estate: the Innis Centre is a modern, purpose-built facility, with sophisticated protection designed into its fabric. There are numerous internal and external cameras, alarmed entrances and exits, and electronic controls. These are complemented by clear procedures and individual risk management plans for each resident.

- 3.9 MUST Hostel and Dismas House provide good examples of refurbished properties that manage to combine pleasant living environments with reasonable levels of security. TSA Centenary House serves a much broader spectrum of residents than offenders, and has less physical security.
- 3.10 Edward Street and Thompson House are old properties with inherent design flaws: Edward Street has a poorly-located office that does not afford staff any visual control over residents, and is the only facility where residents share rooms. Thompson House has established a premises committee, including SP representation, and engaged architects to prepare plans for much needed refurbishment. It had some obvious security issues which are now in the process of being remedied e.g. the back door was not alarmed, and residents had breached curfews by entering and exiting via this route. **We recommend that a minimum physical security specification should be agreed by commissioners and providers for each AP, and this should be incorporated within their statement of purpose.**



Table Two

	TSA Centenary House	Dismas House	Edward Street	Innis Centre	MUST Hostel	Thompson House
External cameras	2	2	2	3	4	4
Internal cameras	33	8	0	13	13	0
Door Alarms	1	3	2	4	6	4
Staff Personal Alarms	No	Optional	Compulsory	Compulsory	Compulsory	Optional
Room Checks	As required	3 per day	3 per day	5 per day	Minimum weekly	5 per day
Resident Checks	Midnight; Sign In/Out for PBNI residents	5 per day Sign In/Out	3 per day; Sign In/Out for PBNI residents	5 per day Sign In/Out	Nightly Sign In/Out for PBNI residents	Sign In/Out

3.11 While physical security is of increasing importance, APs can never replicate prisons in the community. The optimum approach combines good physical security with proactive dynamic security – achieved by alert staff who collate and use good intelligence, undertake regular room searches, develop close working relationships with criminal justice agencies and control residents activity in proportion to assessed risk.

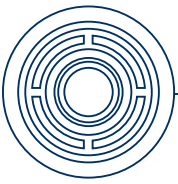
residence have to be approved by a probation senior manager. Some of these are people who are difficult to relocate. They may also be easily-managed residents who help balance the AP population and provide guaranteed income. Population balance is an important factor for the APs, which needs to be offset against the increasing need to supervise new serious offenders who are being released from prison.

Funding and Occupancy

3.12 Some residents remain in the APs for unduly long periods of time: while the notional optimum length of stay is six months, there were 16 residents who had remained for longer than two years during the period July 2006 – July 2007. Such extended periods of

3.13 Bedblocking can also be caused by the significant difficulties that arise in obtaining move-on accommodation for AP residents, as well as the current lack of a structured resettlement process. This is especially true for sex offenders. When residents do not move on in a planned fashion, then much good





work and energy can be wasted, and everybody's efforts can quickly be undermined. Consequently the NISOSMC agencies propose to establish a set of arrangements whereby they will work with APs to actively case manage each resident, so that they progress to more permanent accommodation within a reasonable timescale.

The case of A highlights the difficulty of obtaining move-on accommodation. He spent two years in an AP because police and Social Services were very reluctant to approve a residence for him. He and his key worker identified 26 possible addresses before one was finally approved. Some of these proposals might have been satisfactory, but the opportunities were lost because of the agencies slow pace in responding, whether to approve or reject.


- 3.14 PBNi is affected by financial anomalies in relation to funding of AP residents. In addition to inescapable voluntaries, they also have to subsidise residents who do not qualify for housing benefit (such as foreign national offenders) and are under probation supervision. And they have to pay supplements when APs agree to take high risk residents who require extra staffing. No additional budget is available to PBNi for these purposes.
- 3.15 It is recognised by the APs and their statutory partners that acquisition of funding is likely to become more difficult in the future. Given the increasing criminal justice demands

on APs, and the degree of mental health and child protection issues that they deal with, **we recommend that the commissioning agencies should approach the NIO and health providers to provide funding for APs.**

(b) MASRAM arrangements in place and known

Offenders subject to Multi-Agency Sex Offender Risk Assessment and Management (MASRAM) have relevant public protection plans in place, which are known to, and implemented by AP staff.

- 3.16 A significant proportion of AP residents are subject to MASRAM arrangements. The MASRAM process currently applies to all adult sex offenders who are required to notify under the terms of the Sexual Offences Act 2003, and to certain other offenders about whom there are concerns. MASRAM represents the co-ordination of the responsibilities of criminal justice agencies and other relevant bodies to manage the risk posed by these offenders.
- 3.17 The pressures imposed by MASRAM on APs were best seen in summer 2006 when the Northern Ireland Secretary of State issued a directive to the effect that Schedule 1 sex offenders could not reside in an AP which was adjacent to a school. This followed a television programme about APs in England.
- 3.18 The directive led to all sex offenders against children being temporarily moved from two of the Northern



Ireland APs, at very short notice and amid a barrage of media attention. The aftermath experienced by APs and their partner agencies was described to Inspectors as difficult to manage for staff, residents and the operational MASRAM agencies. It placed particular stress on local independent committees with the pressure only beginning to ease over one year later.

- 3.19 It is undesirable to mix high risk offenders with lower risk offenders in the same accommodation – the regime is often determined by the former, and their media profile can impact unfairly on other residents. High profile cases have periodically drawn attention to the APs, to the extent of generating street protests and threats that have required police protection for the premises. The challenges of working and living in such an environment are most likely to increase when the MASRAM arrangements extend to include violent offenders - probably during 2008. Therefore the strategic reviews of offender accommodation and statements of purpose should take account of the likely impact of extended MASRAM arrangements when determining the way ahead.
- 3.20 It was clear to Inspectors that staff in all of the APs were well aware of the individual MASRAM requirements for each of their residents. They are invited to attend Area Sex Offender Risk Management Committee (ASORMC) meetings, and these meetings benefit considerably from their detailed knowledge of the offenders. It was also apparent that

AP managers' familiarity with both current and former residents was especially useful at the weekly AP allocation panel.

- 3.21 Although it was clear that MASRAM requirements were in place and known, the quality of case recording to evidence this work was varied: it was most comprehensive in the Innis Centre, while MUST and TSA Centenary House had well-ordered files where clear indexing provided easy access. The best files incorporated up-to-date risk assessments, notes of keywork sessions and enforcement action. They demonstrated continuous liaison with probation officers and police, as well as managerial oversight to ensure quality control.
- 3.22 Thompson House needs to improve its file recording as it had loosely-ordered receptacles of information that were very difficult to follow. Residents' status was unclear, there were unsigned work plans, inconsistencies in recording, limited evidence of tripartite meetings with probation officers and gaps in case entries without explanation. Inspectors were told files have recently been updated and an audit system has been put in place to ensure compliance. **We recommend that file recording standards be developed and implemented across the AP estate in order to ensure uniformly high quality practice. These standards should be articulated in the statement of purpose drawn up by each AP.**




(c) Risk assessment

The case file shows that all relevant documentation is available to the AP in respect of risk assessment; and that the AP contributes to ongoing risk assessment.

- 3.23 Risk assessment has become a sophisticated process, detailed in design and subject to continuous updating. It is led by the PBNI in respect of all AP applicants, whether under community supervision or in prison.
- 3.24 The *raison d'être* for approved accommodation has shifted significantly over the past ten years – it is now primarily a means to manage risk, rather than a means of dealing with homelessness. The APs are clear that public protection is their priority, to be achieved through controlling residents' liberty and addressing their complex personal and emotional needs.

The Allocation Panel

- 3.25 The main forum for initiating and sharing risk assessments of all potential AP residents (most of whom are in prison, either on remand or nearing the end of a sentence) is a weekly allocation panel meeting. The panel comprises the six AP managers, is convened by PBNI and uses a standard assessment process which is administered by PBNI's Intensive Supervision Unit (ISU). The ISU manager chairs the meeting where new referrals are allocated for interview by panel members. The interviewer then reports back, ideally the following week for a decision to be taken about which AP, if any, can offer a place.
- 3.26 The allocation meeting is time consuming, particularly for rural AP managers who have to travel. However it is a very useful forum for information sharing, and PBNI's onsite administrative support functions very well: minutes are prepared contemporaneously, and ongoing e-mail contact with referrers is possible throughout the meeting.
- 3.27 Inspectors noted some imbalances in the allocation meeting:
- Extern tended to take on most of the prisoner interviews on behalf of the group, and also tended to accept the more challenging cases as residents;
 - In some cases when managers were unable to attend there was no deputy, effectively removing that AP from accepting cases or committing to prisoner interviews; and
 - The quality of reports and feedback to the panel were inconsistent and varied depending on who undertook the assessments.
- 3.28 The allocation process becomes most pressurised when high profile offenders or former problem residents are under discussion. Recent reasons for refusal have included the AP manager being on leave, and staffing levels being too low. These frustrate PBNI because they suggest APs have varying tolerance levels, while for their part the APs feel unreasonably pressurised to accept referrals who are likely to fail.
- 3.29 These difficulties are moderated by familiarity among participants and considerate chairmanship, and in



reality the allocation panel works very well – things are much better than they were prior to its establishment. However its practices have evolved without planning, and there is a degree of inequity which could be lessened if simple terms of reference were agreed and applied. **We recommend that Terms of Reference (ToR) be devised for the weekly allocation meeting. These ToR should take account of AP statements of purpose, and should include rotation of duties and ensure attendance of deputies when managers are unavailable.**

and
We also recommend that the partner agencies consider the value of appointing an independent chair for the allocation panel, whose role could extend to chairing the bi-monthly managers' forum, contributing to the proposed move-on arrangements and ensuring effective liaison between commissioners and providers.

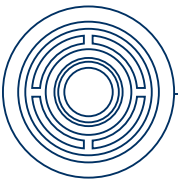
Mental Health

3.30 The allocation panel frequently has to consider applicants who have a learning disability, are mentally ill or suffer from a personality disorder. It can be very difficult for panellists to establish whether the paramount issue is the offender's mental health or their offending behaviour, and there is pressure for APs to take offenders from psychiatric hospitals when they are subject to criminal court orders. Both the APs and PBNi

comment that the number of such cases is increasing. Inspectors heard of APs having to manage some seriously disturbed residents without support from mental health services. Community mental health practitioners work well with Extern's homeless support team to manage mentally ill or personality disordered referrals in other settings, but this support is not routinely available to the APs. **We recommend that the commissioning agencies and APs continue to seek support from statutory mental health services; and in their absence, explore the opportunity for partnership with a voluntary organisation, to support the care and management of AP residents who require mental health support.**

3.31 In September 2007, three of the six Category Three (highest risk) sex offenders living in the community in Northern Ireland had to be accommodated in APs. In each case their personality disorder or mental health needs were a key factor in determining high risk levels and therefore requiring an AP placement in order to help manage them safely.

At the end of his prison sentence B was twice gate arrested and returned to prison because a suitable residence could not be obtained for him in Northern Ireland. His case was judicially reviewed in relation to breach of his human rights, and he was finally moved to a semi-secure clinic in England, funded by the DHSSPS.



Bail candidates

3.32 Bail candidates account for 43% of AP applicants, yet this figure converts into only 14% of actual residents. This is due to two main factors:

- The majority of beds are required for adjudicated offenders, for whom residence in an AP is often directed by a court as an integral element of their risk management plan; and
- All remand prisoners who suggest they want to apply for bail to live in an AP have to be considered by the panel. Yet for many this turns out to be a fruitless exercise when they are refused bail at court.

3.33 In order to curtail this wasted effort the allocation panel proposed that they would only interview those whom courts had indicated would receive bail, subject to availability of an AP placement. However this proposal was not accepted by sentencers.

Communication


3.34 The complexities that are involved in AP referral, residence and move-on means that communication will always pose challenges, even in a small jurisdiction. For example during summer 2006 there were 19 bail applicants in Maghaberry prison expecting a decision about availability of a placement, yet throughout that period there were actually no places available for bailees in any of the APs. This information did not filter through to probation staff in Maghaberry, so they were unable to inform the prisoners, who became

increasingly frustrated by a lack of information and no sense of progress.

3.35 APs also suggested to Inspectors that it would be beneficial for them to develop greater direct liaison with specialist bodies such as the Life Sentence Review Commissioners in cases where a lifer was considered to require a period of residence in an AP. This would provide clarity about opportunities available and limitations on the offender residing in an AP.

3.36 Despite the fact that many AP residents have previously spent considerable periods in prison, members of the allocation panel report that applications for placements are often only made as the end of sentence approaches. The APs suggest that it would be useful for them to receive more information about applicants' progress while in custody – such as their compliance with the prison regime and details of medication. **We recommend that AP referral documentation should be amended to explicitly convey information about applicants conduct while in custody, and other relevant personal information.**

3.37 APs are seldom consulted about post custody accommodation until the latter stages of a prisoners' sentence, and there is a need for planning and communication to commence earlier, particularly to allow pre-release visits to the APs. The case of C is exceptional, but illustrates the difficulty with late referrals, as well as other challenges for the APs in managing high risk offenders.



C, a personality disordered offender, was released from a 12 year sentence in August 2007. Because of concerns about risk that only emerged towards the end of his sentence, an AP was asked to take him at very short notice and a strict supervision programme was agreed with PBNI. However wider discussions about his case resulted in this programme being reviewed, and he was refused permission to be unsupervised in the community at any time.

This restriction was unrealistic for the AP in terms of helping C resettle within the community; PBNI had to find additional monies for enhanced staffing to match the level of supervision required; and C's lengthy stay was unsettled because it could not be agreed who would fund the placement that had been obtained for him in a specialist English clinic.

Documentation

- 3.38 The documents which Inspectors saw at the allocation panel were suitable for purpose. As would be expected information about adjudicated offenders was more comprehensive than information about bail applicants who were not previously known to the criminal justice system.
- 3.39 The APs are reliant upon others to provide them with relevant material, such as risk assessments, court reports, criminal records, and to keep this material up to date. As indicated earlier, there is scope to improve the quality and quantity of information provided to the APs, especially in respect of people who have been in prison.
- 3.40 The APs commented that the quality of PBNI's risk assessment process and their pre-sentence court reports have improved significantly in recent years. This is mainly due to the standards that PBNI applies in its assessment and management of offenders. These standards require probation officers to share relevant information with partners such as APs, and to provide feedback to senior managers on residents' conduct. In the majority of AP files that Inspectors examined, the relevant material from PBNI was available in an up to date format.
- 3.41 Besides examining residents' files for evidence of risk assessment and risk management, Inspectors also sought evidence that risk was being handled more broadly: by regular staff supervision, team meetings, residents meetings and good staff training opportunities provided. There was some good evidence in most APs, though Thompson House needs to improve this area of its operation.
- 3.42 Where possible and relevant AP representatives attend Area Sex Offender Risk Management Committee (ASORMC) meetings. Minutes of these meetings are deliberately limited in content due to sensitivity, and are not routinely forwarded to APs when they do not attend. Inspectors believe that if the APs are to be properly included as important contributors to risk assessment and management processes, then they should be represented at relevant ASORMC




meetings - the less suitable alternative would be to receive a prompt debrief from the DRM. **We recommend that the NISOSMC address this issue in conjunction with the APs and Designated Risk Managers.**

(d) Monitoring and surveillance

Staff carry out monitoring and surveillance in line with their policy and individual risk management plans.

- 3.43 There has been a significant increase in the monitoring and surveillance of AP residents in recent years. Several residents suggested to Inspectors that they find monitoring highly intrusive, to the extent that some indicated they would rather have remained in prison than live in an AP with such infringement.
- 3.44 Each AP now applies a standard curfew in respect of sex offenders – they are not permitted to be outside the premises at times when children are arriving at school or leaving school. This curfew is additional to the various requirements that may be applied by courts and supervising probation officers, and is enforced by requiring residents to sign in and out.
- 3.45 Links with PSNI are very important if the APs are to apply effective monitoring and surveillance of residents. As it happens, none of the APs are located more than 500 yards from a police station, and each AP manager was able to identify local police with whom they have close working relationships.
- 3.46 Some examples of close liaison between APs and local police were provided:
- Police receive a weekly email from MUST containing an updated list of residents so that they can verify previous criminal convictions, and local patrols can be alerted where necessary;
 - Most APs will invite police onto the premises with dogs to support searches if necessary.
- 3.47 While local police are invariably reported as responsive and supportive, they are not empowered to undertake drug or alcohol testing of AP residents. A pilot project for alcohol testing has now commenced in conjunction with the NIPS in three of the APs. **Subject to a satisfactory outcome of this pilot, we recommend extension of alcohol testing to all APs, and introduction of drug testing where necessary.**
- 3.48 CCTV coverage and door alarms are necessary to monitor residents' movements effectively. The extent of coverage varies considerably between the APs and Table Two indicates the variations. At a minimum all have camera cover on front and rear doors.
- 3.49 Out-of-hours support is very important in a residential environment. Each AP has an on-call facility provided by their managing body. These arrangements are reported to work satisfactorily, though they can mean that managers (and in some cases committee members) are tied to the facility even when off-duty.



3.50 The PBNI also provide an out-of-hours contact number. Although seldom required, AP managers have found it difficult to access, and therefore tend to contact PBNI's ISU manager in the event of difficulty because he has been readily accessible and responsive to their needs. **We recommend that PBNI review its out-of-hours contact and standby arrangements.**

3.51 Visits by management committee members and other interested parties provide useful support and accountability mechanisms for the APs. Inspectors saw excellent evidence of The Salvation Army's monitoring in Centenary House. It is regularly visited by internal Inspectors who make a thorough assessment of its practice, provide detailed written reports of their findings and undertake follow-up inspection to assess progress. **We recommend that each AP should be subject to regular formal monitoring by its parent body or management committee, and that this monitoring should incorporate a written report to the full management body.**

3.52 CJI has also agreed a regular inspection regime with the APs, primarily to assess their risk management work, beginning in 2008. This arrangement is welcomed by each of the facilities and their partner criminal justice agencies.

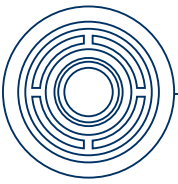
(e) Risk management and enforcement

Responsibility for the monitoring of risk management and the enforcement of orders/licences is clearly defined with appropriate systems in place. There is evidence of effective enforcement in all cases and clear evidence and documentation with regard to the link with risk management.

3.53 Since they accommodate offenders on a 24/7 basis, often for lengthy periods of time, the APs are centrally placed to make a major contribution to risk management and enforcement. A key role in this respect is to communicate with probation officers and police, either to verify progress by the offender, or to provide evidence that will substantiate breach action for non-compliance with bail and other court orders.

3.54 Examination of files satisfied Inspectors that all the APs were fully conversant with court requirements in respect of their residents, and the AP managers reported that non-compliance breaches are dealt with promptly by PBNI once they provide relevant information.

3.55 However it is more difficult to secure PSNI action when bail requirements are breached. Each of the APs routinely notifies local police about breaches of bail (e.g. residents staying out beyond permitted curfew times, or consuming alcohol). They report that local police are responsive in these matters, but sometimes feel unable to deal with the breach, as practice has been to require a decision from the investigating officer



(IO) – who is usually based at another police station. IOs can be slow to take a decision and relay it to the AP via the local station, and when obtained their decision may not support enforcement. This not only undermines AP staff, but depletes confidence in the criminal justice system. Furthermore it is an inaccurate premise, as an IO decision is *not* required under the terms of the Criminal Justice (NI) Order.

One AP had a resident who breached his curfew on ten occasions, all of which were notified to the IO. The IO was based 50 miles away and did not apply any sanction, to the equal frustration of both the AP and local police.

We recommend that police use their powers of arrest under Article 6 of the Criminal Justice (NI) Order 2003 when AP residents breach bail requirements.

- 3.56 Decisions to evict AP residents are meant to be taken jointly by the AP and PBNI, and if necessary they will involve other agencies. Serious dilemmas can be caused by evicting someone who may pose a greater risk to the public as a result of being homeless. These situations therefore need to be handled carefully, not only in terms of the immediate situation that has led to the breakdown, but to ensure that the offender has somewhere safe to reside after leaving the AP – which is often difficult to obtain. **We recommend that each AP should agree a**

clear protocol for evictions with PBNI, and include other relevant agencies such as the PSNI and NIHE in design and delivery of this protocol. It should identify that public protection is the priority, include a range of options for move-on, and ensure ready access to PBNI support in keeping with our recommendation at paragraph 3.51.

- 3.57 Offending behaviour and personal development programmes can make a major contribution to reducing risk, and the stability of living in an AP can enhance the likelihood of offenders completing programmes which are demanding in content and duration. Because most sex offenders do not complete programmes while in prison (see CJI's June 2007 *Inspection of the Northern Ireland Prisoner Resettlement Strategy* for more detail) they have to do so after release if ordered by the sentencing court. AP residents will commence individual work on programmes, but staff shortages mean it can take up to a year for them to commence the community sex offender groupwork programme (CSOGP). This is a missed opportunity which could be significantly addressed by having more programmes delivered while offenders are still in prison.

The Future



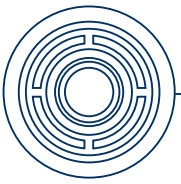
- 4.1 There are two key issues that require consideration for the future development of APs in Northern Ireland: high risk provision; and a facility for female offenders.

High risk provision

- 4.2 Although Inspectors were told that no extra AP places are currently required in Northern Ireland, views were expressed about a more pressing need for reconfiguration of the existing estate.
- 4.3 Since the vast majority of generic temporary accommodation providers in Northern Ireland do not accept sex offenders, there is disproportionate demand on the six approved premises to accept them. MASRAM frequently requires high risk offenders to be tested in a halfway house before they resume independent living after being released from prison. Extension of MASRAM to include violent offenders and establishment of parole requirements may well increase this demand.
- 4.4 Most offender accommodation in England and Wales is directly managed by local probation services, which means probation officers have little difficulty in obtaining placements

for high profile and dangerous offenders. The fact that PBNI does not directly manage any of the local APs can cause them problems in acquiring suitable placements for some of the most challenging offenders. PBNI recognises the unreasonableness of asking APs to take people who are beyond their competence to manage. In order to fulfil court orders they routinely need five to six places for particularly challenging offenders. In a few extreme cases, offenders have been returned to prison in the absence of suitable alternatives, leading to judicial reviews because of alleged infringements of their human rights.

- 4.5 Consideration has been given to establishing a high risk facility, which would cater for anticipated demand generated by the Criminal Justice (Northern Ireland) Order 2008. All options including the possibility of commissioning services will be considered. Statutory bodies suggest that their current preference is for this facility to be directly managed by a statutory criminal justice agency, which would in all likelihood be PBNI. Both VCS providers and statutory agencies identify some important considerations and implications of developing such a facility:




- Location and planning issues would require careful attention;
- The current AP “market place” would be affected, with a possible knock-on effect on the roles of other facilities. In all likelihood the existing APs would automatically reduce the risk levels of resident that they accept, and let the new provider manage the most difficult cases;
- If it is run by a statutory organisation then the benefits of VCS participation could be lost in the new facility e.g. separation of the statutory enforcement function from the provision of care and supervision, as well as access to a wider range of funding sources; local management groups which provide links to the community and engage ordinary people in the criminal justice process; and
- It would be important to avoid replication of prison conditions, and provide a positive regime that helps offenders return to the community and on to independent living in a safe manner.

There has been no formal discussion between statutory agencies and the VCS about the nature of new high risk provision. Consequently **we recommend the debate about new provision should be formally initiated by the PBNI, NIHE and the NIPS. The debate should incorporate current AP providers and their commissioners, as well as other stakeholders, and should synchronise with current**

accommodation reviews and statements of purpose.

Accommodation for female offenders

- 4.6 It is difficult to cater adequately – in terms of regime and location – for the small number of female offenders in Northern Ireland who require supervised accommodation. MUST is the only current provider, though PBNI also has an arrangement with Women’s Aid to provide bedspaces for female offenders, pending implementation of a longer term strategy.
- 4.7 A substantial amount of work has been undertaken by the NIPS and PBNI to develop appropriate provision for female offenders, including accommodation. Latest thinking suggests that a dedicated residential facility for female offenders is not the best way forward, so other avenues are now being explored to address this gap in provision.



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