



Ministry of
JUSTICE

NOMS Gwasanaeth Cenedlaethol
Rheoli Troseddwyr
National Offender Management Service

NOMS WALES

Commissioning and Business Plan 2008-09

CONSULTATION PAPER

A consultation produced by the National Offender Management Service Wales, part of the
Ministry of Justice.

Published October 2007. This consultation will end on 28 November 2007

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YVONNE THOMAS, DIRECTOR OF OFFENDER MANAGEMENT WALES

1. INTRODUCTION

The purpose of this consultation is to seek your comments and views on the key issues that I need to take into account in preparing the NOMS Wales Commissioning and Business Plan for 2008-09.

My main aims will be to focus on protecting the public, reducing re-offending and providing increased opportunities for adult offenders to become responsible citizens and make positive economic and social contributions to their communities in Wales. However, to realise the full potential of what can be achieved in Wales my commissioning plan needs to be connected to what is being commissioned outside the criminal justice system, and not just within it. Your contribution will be a valuable part of making that process happen.

Introducing commissioning for offender management services remains one of the major features of reform of the criminal justice system, and the recent passing of the Offender Management Act 2007 provides us with the foundations for this new approach.

Commissioning will take place at three levels. At the National level, England and Wales, at an all-Wales level, and at an area level to reflect the four co-terminus areas in Wales covered by police, probation and Local Criminal Justice Boards. I will work with local lead providers under contract to deliver services in an area. Probation Areas will be guaranteed lead provider status until 2010, subject of course to their meeting the required performance levels.

It is envisaged that Probation Areas will concentrate on delivering offender management, and will continue to leverage Best Value principles in their assessments of who is best placed to deliver the work. Probation Areas have contributed to the strength of the third sector in using a range of such bodies to deliver appropriate services. This trend is a key part of our strategy to use public money effectively, and to contribute to growing a vibrant economy of offender services in Wales. We will continue to support these activities. For public sector prisons in Wales I will be negotiating the funding for services with HMPS in 2008-09. For our private sector prison, we will continue to monitor and manage costs and deliverables for this important resource.

Where I believe that better value can be achieved by commissioning services on an all-Wales basis, I would be prepared to contract directly with providers as a complement to, not a substitute for, local delivery.

The NOMS Wales Commissioning and Business Plan for 2008-09 will focus on the key areas that are most likely to reduce re-offending and provide better protection for citizens in Wales. Along with the consultation comments I receive, my commissioning will be informed by:

- The UK Government's national priorities - as identified in the NOMS Commissioning and Partnership Framework document
- Court demand on community and custodial services

- The risks offenders pose to the community
- Identified criminogenic needs of offenders using OASys - the Offender Assessment System
- Research evidence on what works to reduce re-offending
- Available resources

I will be developing my commissioning and business plan on the basis that there will not be any increase in allocation for 2008-09 for operational service delivery. This will mean that I will be looking to provide any new services that are evidenced as being required either through efficiency savings or a managed disinvestment to re-invest.

Where a compelling case can be made for additional capital spend or operational spend in support of new initiatives, I will work with my colleagues in NOMS and our providers – both existing and prospective – to attempt to secure funding.


For next year our priorities must shift into using our new commissioning structures to support and enable our existing and prospective providers to deliver core services, and to explore new models of delivery which deliver more for less. Joining the commissioning of prison and probation services should give us all opportunities for delivering higher quality services in a cost neutral, or cost advantageous manner. Your thoughts and comments in this area would be very welcome.

You should note that most of the priorities identified in the NOMS Wales Commissioning Plan for 2007-08 will continue for 2008-09. This will provide stability and continuity for current providers and allow initiatives begun during 2007-08 to be carried through. This position should not limit or inhibit your response to my consultation. I consider it important that the development of commissioning, within the delivery of correctional services, continues as the focus on provider performance. Finding the best fit between need and provision will help to make best use of the resources that are available.

I intend to continue to work collaboratively with the many bodies we depend upon, and who depend upon us, across Wales. Where we have opportunities to leverage further value in achieving our common objectives by joining our resources and budgets together I will commit to doing so, and would be most interested in discussing such approaches as part of our planning process.

I look forward to receiving your contribution to the consultation and to help provide some focus I have put forward 17 key questions for you to consider. Please do not feel limited by these questions and I would welcome any additional comments that you consider relevant. A consultation questionnaire is at Annex 4.

Can I thank you for taking your time to input to this consultation process.



Yvonne Thomas
Director of Offender Management Wales

Question 1: Given that, with the exception of capital projects, new or enhanced services can only be funded by efficiency savings or disinvestment in current services what current provision do you consider to be of low priority and could be reduced?

2. KEY AREAS FOR COMMISSIONING

Wales has a comparatively lower crime rate, as recorded in Police Statistics (87 recorded offences per 1000 population, compared to a national average for England and Wales of 100) and the British Crime Survey (BCS) 2006-07 (295.5 incidents of household crime per 1000 households compared to a national average of 303.8).

Confidence in the Criminal Justice System (CJS) in Wales as recorded by the BCS was the same as the national average for England and Wales with 41% believing the CJS is effective in bringing people to justice.

The priorities we envisage for 2008-09 build on the first two years of NOMS Wales commissioning. They flow from a process that has begun to ensure a much closer alignment between offender risk and need, sentencer demand and the specific services provided on the ground. In this way they can make a major contribution to public protection and re-offending rates of offenders under the supervision of the National Offender Management Service.

We also want to ensure that the priorities for 2008-09 continue to focus on driving up standards, reducing inequalities of offender access and outcome and providing quality assurance to stakeholders.

As NOMS has developed over the last 3 years a number of key themes have emerged involving both the needs of offenders in Wales and the services being provided to meet them. These have been identified both at an England and Wales level and an all-Wales level and are outlined below.

2.1 Offender Management

Implementation of the National Offender Management Model is the cornerstone of effective practice with offenders and relies on accurate assessment, good planning, robust implementation, regular review and ongoing evaluation of the interventions selected. New National Standards for the Management of Offenders have been issued and lead providers will be monitored against these.

Phases 1 and 2 of the Offender Management Model have been introduced. These phases cover:

- Offenders under supervision in the community
- Those at high risk of causing harm
- Prolific and other Priority Offenders (PPOs) in custody

The implementation of Phase 3 of Offender Management relating to prisoners sentenced to an indeterminate sentence for Public Protection (IPP) will be a priority during 2008.

During 2008-09 we will be working with prison and probation colleagues in the continued development of the Offender Management Model and to ensure that quality of planning and implementation is embedded within sentence plans.

We will improve the targeting of resources toward higher risk offenders PPOs and Multi Agency Public Protection Arrangements (MAPPA) cases so that they receive greater investment of time and resources. To balance this we would want, wherever possible, to divert low risk offenders from commissioned offender services. The Service Level Agreements and contracts for 2008-09 will reflect this change of emphasis.

Question 2: What do you consider is working well in offender management in Wales and can be improved?

Question 3: PPOs over 21 years of age who are sentenced to less than 12 months custody are not subject to statutory supervision by the probation service when they are released into their community, but the likelihood of them re-offending is high. Should we invest in working with this particular group of PPOs?

2.2 Targeting interventions at offenders who pose the highest risk of reoffending and causing harm

The following risk profile table shows the total percentage of offenders, by offender management tier, supervised by the Probation Service in Wales on either a Community Order or a Suspended Sentence Order, compared to the England and Wales average.

Court Order Commencements 2006 – 2007

Community Orders and Suspended Sentence Orders		
Risk Profile	England & Wales	Wales
Tier 1 (low risk of re-offending and harm)	22.7%	23.3%
Tier 2	31.3%	34.0%
Tier 3	40.0%	36.0%
Tier 4 (high/very high risk of harm)	6.0%	6.7%

2.3 NOMS Research and Development Statistics

In the custodial setting prisoners in Wales show a risk profile generally in line with prisoners in all of England & Wales. It should be noted, however that on the 30th June 2007, 42% of all adult offenders committed from Welsh courts were held in prisons in England.

The criminogenic needs in Wales, as identified by NPS OASys assessments 2006-07, show that overall the proportion of offenders with offending related needs, in each OASys category is above that for England & Wales as a whole. The greatest proportion of needs for Wales as a whole are centred around the following OASys sections:

- Thinking and Behaviour - 60%
- Education Training and Employment (ETE) - 60%
- Alcohol - 49%

In Wales the identified criminogenic needs for males are above the England and Wales proportions. This is also the case highlighted by separate needs profiles for High Risk of harm Offenders, PPOs and perpetrators of Domestic Violence.

For women offenders from Wales, the proportions of criminogenic need within each section of OASys are above the England & Wales proportions. The only exception to this is the 'attitudes' section which reflects the England & Wales profile.

Provision is in place to address needs around ETE and thinking and behaviour. This will be developed further and refined across prison and probation. Work in relation to alcohol needs will also be developed further in 2008-09.

Question 4: The above table shows the percentage breakdown by risk of the offenders supervised by probation. More than 57% are in the lower Tiers of 1 and 2. What changes could be made to manage these types of offenders more appropriately to provide more resources to work with higher risk offenders?

Question 5: We are working closely with the Welsh Assembly Government to deliver the commitments in Learning to Change for the delivery of offender learning and skills provision in Wales. It is recognised that a lot of good work is already being done in this area but how can we improve and accelerate the join-up between prison and community ETE provision?

2.4 Drugs and Alcohol

Both drug and alcohol misuse remain significant factors in offending behaviour, but most resources go into addressing drug issues. Some drug misusers commit large numbers of offences of theft or burglary to fund their drug habits while many offences

of violence, including domestic violence, are committed when under the influence of alcohol.

An analysis of OASys data shows that for offenders in the community in Wales there is a higher need to address alcohol than drugs. This however is not the case for prisoners held in Wales, where the need is almost identical.

OASys assessments 2006 – 2007

	England and Wales	Wales
Community		
Drugs	26%	28%
Alcohol	44%	49%
Prison (Adult males)		
Drugs	39%	45%
Alcohol	32%	46%

Question 6: How can we improve and enhance alcohol provision to better meet the needs of offenders and reduce re-offending?

2.5 Unpaid Work

Unpaid work is a popular disposal to the courts as it provides punishment to an offender while making some reparation to the community. Since the creation of Community Payback unpaid work is increasingly focused on work that the communities themselves have asked to be carried out. It is also possible to enhance offenders work skills and qualifications while they carry out this sentence.

Since the introduction of unpaid work requirements in community and suspended sentence orders (Criminal Justice Act 2003), the number of hours ordered to be undertaken by offenders has risen dramatically. Courts now have greater flexibility than before in adding unpaid work to a range of other requirements. In Wales it is the most frequently used requirement of a Community Order with 30% of orders made in 2006 having an unpaid work requirement. In addition a further 21% of suspended sentence orders in Wales had unpaid work as a requirement. Both correspond to the national average for England and Wales of 31% and 21% respectively

We recognise that unpaid work is a highly popular and effective sentence. It has the lowest reconviction rate of any community order or prison sentence with reconvictions currently assessed at 52.2% against a predicted reconviction rate of 57.6% (RDS Reconviction Study 2004). However, there is a concern that some low risk offenders may be being placed on unpaid work, where previously they may

have received a fine.

Question 7: In what ways can we work with courts and providers to consider alternatives to the use of unpaid work sentences that may not be required to reduce re-offending, or be an appropriate punishment for offenders?

2.6 Through the Prison Gate working

We recognise that in delivering the expectations of the Carter Report (2003) and in delivering end to end offender management, effective “through the gate” interventions have to be achieved. We are already supporting this work through developing programmes eg. piloting the delivery of the Integrated Domestic Abuse Programme in HMP Cardiff, and with our demonstrator Education and Training project, *Pathways to Work*, which includes HMP & YOI Parc, HMP Cardiff, and South Wales Probation among others. However, we are aware that more needs to be done.

Question 8: What can we do to build upon “through the gate” working and ensure it is better embedded?

Question 9: “Through the gate” is believed to be most effective when a prisoner is held close to their home community. What initiative could be developed that would support this approach?

Question 10: In prioritising limited resources how can we ensure that the right interventions are provided to prisoners at the right time to provide maximum benefit? Should this also include prisoners on remand?

2.7 Diversity and Equality Issues

Women

The Corston Report (March 2007), *The Women Offenders Accommodation Pathfinder Report for Wales (From Homeless to Home – June 2007)*, and a recent report commissioned by the Fawcett Society (*Provision for Women Offenders in the Community - 2007*) bring together disparate research findings on offending-related needs, what works with women and the different models of practice being used.

These reports pose important questions for commissioners and there is no doubt that provision designed for men does not necessarily meet the needs of women. Both reports demonstrate considerable unmet needs in relation to education and employment, health (including mental health), housing and finance and debt. Women only provision is recommended with a focus on empowerment, use of effective learning styles, an holistic stance and practical help with transport and childcare.

This is of particular relevance in Wales where there are no custodial facilities for women, which means that women prisoners are held in prisons in England. On the 30th June 2007 there were 187 women sentenced from courts in Wales held in

custody in England of which 37 were on remand. The Welsh Affairs Select Committee Report (*Welsh Prisoners in the Prison Estate - June 2007*) also made recommendations to better support women and their children and families and the Government responded positively to many of the areas raised (August 2007).

There are differing profiles of criminogenic needs for male and female offenders and therefore specific interventions are required to reduce the risk of women re-offending. We are currently working with other partners to develop a demonstrator project *Turnaround* to provide women offenders and those at risk of offending with a gateway to multi-service support specifically for their needs. The intention is to establish a women's centric service which could eventually be provided throughout Wales. There are however many challenges in developing and sustaining this service. The scope of the *Turnaround* project is deliberately ambitious, and it crosses a number of organisations and government boundaries as does the reducing re-offending agenda itself. Our approach has been to ignore these boundaries in designing the service, and we have been supported by a wide range of contributing bodies and organisations in doing so. In order to implement such a service, we would need continuing commitment from those partners and even wider participation from all parties who fund and deliver the reducing re-offending services across Wales.

Young People, Young Adult Offenders and Vulnerable People in custody

There is growing evidence that the male, 18 to 24 age group, whilst demonstrating a similar range of needs to other offenders are harder to engage in work that can assist in bringing about change. We will continue working with the Youth Justice Service to best support a young person's transition from Youth Justice Board (YJB) services to prison/probation services. Also we intend to look at improving provision to identify and support vulnerable adults who are placed in custody.

Black and Minority Ethnic (BME) Populations

Diversity and equality research data has traditionally focussed on issues around black and minority ethnic (BME) populations, and to a lesser extent gender. In general BME communities are disproportionately represented, not only in offender profiles, but also as the victims of criminality compared to national and regional population demographics. In addition they experience difficulties in accessing services as a result of language and literacy barriers. This may be an increasing issue amongst white Eastern European groups as well.

We have yet to understand the impact of the recent introduction of disability legislation, however some evidence suggests that around 20% of the total prison population has a diagnosable learning difficulty (with dyslexia being a major issue).

There is very little research evidence around the needs of Lesbian, Gay, Bisexual and Transgender (LGBT) offenders. What is known is that such offenders are more likely to face social exclusion as a result of breakdown in family networks and to have less well established accommodation arrangements.

Finally, we have identified that although the offender population is disproportionately

skewed to reflect people under the age of 30, the fastest growing section of the population is actually offenders aged over 60. Older prisoners are likely to experience similar physical health problems as would be seen amongst the general population; however they are much more likely to have mental health issues and are comparatively less likely to be receiving treatment for these.

Question 11: How could we improve the services provided to women offenders, young adult offenders and vulnerable adults?

Question 12: What practical help could you provide, or suggest, to support the development and roll-out of the Turnaround project.

Question 13: The voluntary and community sector in Wales provides specific services for a range of minority groups and is an important partner in understanding the issues and in having an advocacy role. How can we best commission services from the voluntary and community sector that will help in providing user representation and culturally sensitive services for offender in Wales?

Question 14: As part of our commissioning role we will want to obtain good quality feedback from the users of our services to help improve service provision. What are you aware of that already exists in Wales that could support this, and what are the most effective ways to obtain meaningful feedback that providers could use?

2.8 Welsh Language

NOMS Wales has its own Welsh Language Scheme that enables us to commission services that fully take account of the importance of the Welsh language in delivering services to offenders. We are working with HMPS to identify those prisoners in the prison estate, including those held outside of Wales, whose language of choice is Welsh so that we can determine how best to cater for their language needs.

Each Probation Area in Wales provides services in line with its own Welsh Language Scheme, approved by the Welsh Language Board.

Question 15: How can we ensure that Welsh language needs are identified and are being appropriately met? Should there be a prioritisation of resources given to meeting Welsh language needs for offenders in prisons in England, if so in what way?

2.9 Joining Together in Wales to Reducing Re-offending

We acknowledge that reducing re-offending is not solely a NOMS responsibility as many social factors influence an offender's decisions and behaviour. Reducing offending behaviour involves accessing a much wider range of services than those provided by NOMS and links to the social inclusion and economic regeneration programmes underpinned by the Welsh Assembly Government's social justice agenda. By working closely with the Welsh Assembly Government and a wide range

of key stakeholders in Wales, including local government, voluntary and private organisations and other government departments, we can support the offender's complicated transition from chaotic lifestyle to responsible citizen.

Joining Together in Wales: The Reducing Re-offending Action Plan identifies a series of partnership actions across organisations that are to be delivered by 2008 and beyond. Our commissioning plan will link with and build on the partnership work that is already being delivered.

Question 16: How can NOMS Wales ensure that reducing re-offending forms part of an holistic approach at an all-Wales and local authority level.

Question 17: How do we provide an effective connection with other partners commissioning plans to maximize outcome focused service delivery?

3. HOW TO RESPOND TO THE CONSULTATION

This paper will be disseminated to a wide variety of individuals and organisations made up of NOMS Wales stakeholders, partners and current providers. Any comments received on the document and responses made to the questions raised in it will be taken into account in preparing the NOMS Wales Commissioning and Business Plan for 2008-09.

The external consultation period will close on 28 November 2007.

We are very keen to receive a wide range of views and comments from this consultation document and a consultation questionnaire is at Annex 4 for this purpose.

These should be sent to Sabrina Workman by 28 November 2007.

Email: Sabrina.workman@justice.gov.uk

Address: NOMS Wales, Ground Floor East, Welsh Assembly Government Building, Cathays Park, Cardiff CF10 3NQ

Extra copies

Further paper copies of this consultation can be obtained from this address and it is also available online at:

<http://noms.justice.gov.uk/noms-regions/wales>

Publication of response

A paper summarising the responses to this consultation will be published in January 2008. The response paper will be available online at:

<http://noms.justice.gov.uk/noms-regions/wales>

Confidentiality

Information provided in response to this consultation, including personal information,

may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998 (DPA).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligation of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on NOMS.

NOMS will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

ANNEX 1

DIRECTOR OF OFFENDER MANAGEMENT WALES

CONSULTATION ON NOMS WALES COMMISSIONING AND BUSINESS PLANS FOR 2008-09

Consultation Paper Distribution

Chairs of Community Safety Partnerships	Area 43
Chairs of Local Criminal Justice Boards	Adef
Chairs of Regional DIP Boards	Basic Skills Agency
Chief Constables of Police	CAIS
Chief Crown Prosecutors	Careers Wales
Chief Probation Officers	Cyswllt Contact Ceredigion
Independent Monitoring Board Chairs,	Citizens Advice Bureau
IMB National Council Representative	Drugaid
Chief Executives of Local Authorities	Gwent Alcohol Trust
Chief Executives of Local Health Boards	GAVO
Director Jobcentre Plus, Wales	Hafal
Director Legal Services Commission, Wales	Ignition
Chief Executives NHS Wales Trusts	Kaleidoscope Project Wales
Prison Governors	MIND
Director HMP Parc	Monmouth Community Recycling
Prison Service Area Manager	NACRO
Probation Board Chairs	NCH Cymru
Director, Courts Service Wales	Newport Wastesavers
Welsh Assembly Government	Neath Port Talbot CVS
Welsh Local Government Association	New Pathways
Youth Offending Teams	Newlink Wales
Youth Justice Board	PAVO
Members of the all-Wales Reducing Re-offending Strategy Board	Prince's Trust Cymru
Members of the Reducing Re-offending Pathway Groups	Powys Drug and Alcohol Centres
	PRISM
AWEMA	Progress to Work
Barnardos	Safer Merthyr Tydfil
Children in Wales	Safer Wales
Clinks	Shelter Cymru
Communities That Care - Cymru	SOVA (Cymru/Wales)
Crime Concern Cymru	Taff Ely Drug Support (TEDS)
DAWN Project Manger	Tai Cantref
Disability Wales	Tai Trothwy
Equality and Human Rights Commission	Tai Hafan
The Children's Commissioner for Wales	Turning Point
Families & Friends of Prisoners	Touchstones 12
Mediation Wales	Victim Support Wales
Stonewall Cymru	Welsh Womens Aid
Swansea Community Chaplincy Project	Working Links
Swansea Neighbourhood Watch Association	Wallich Clifford Housing
West Glamorgan Council Drugs and Alcohol Abuse	Weston Spirit
Wales Women's National Coalition	West Wales Substance Misuse Service
Wales Council for Voluntary Action	
Criminal Justice Manager - Duke of Edinburgh's Awards Scheme	

ANNEX 2

DIRECTOR OF OFFENDER MANAGEMENT WALES

CONSULTATION ON NOMS WALES COMMISSIONING AND BUSINESS PLANS FOR 2008-09

Code of Practice on Consultation

Although in the main this consultation follows the Code of Practice on Consultation issued by the Cabinet Office, it has been decided that because of the need to produce the Commissioning and Business Plan during December 2007, 4 weeks has been allocated to the external consultation, and the consultation document has been designed to present the issues and supporting statements in a form to facilitate such a response timeframe.

Consultation Criteria

- 1 Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.*
- 2 Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.*
- 3 Ensure that your consultation is clear, concise and widely accessible.*
- 4 Give feedback regarding the responses received and how the consultation process influenced the policy.*
- 5 Monitor your Department's effectiveness at consultation, including through the use of a designated Consultation Coordinator.*
- 6 Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.*

An initial Impact Assessment has been considered and does not indicate that the proposals are likely to lead to additional costs or savings for businesses, charities or the voluntary sector or the public sector. Consequently, this paper does not contain an Impact Assessment. If you disagree with this conclusion you are invited to send your reasons as part of your overall response to this paper.

Contact for Comments/Complaints

If you wish to comment on or make a complaint about the consultation process can you please write to Email: Sabrina.workman@justice.gov.uk

Address: NOMS Wales, Ground Floor East, Welsh Assembly Government Building, Cathays Park, Cardiff CF10 3NQ

ANNEX 3

DIRECTOR OF OFFENDER MANAGEMENT WALES

CONSULTATION ON NOMS WALES COMMISSIONING AND BUSINESS PLANS FOR 2008-09

Glossary of Acronyms

BCS	British Crime Survey
BME	Black & Minority Ethnic
CJS	Criminal Justice System
ETE	Education, Training & Employment
IPP	Indeterminate sentence for Public Protection
LGBT	Lesbian, Gay, Bisexual & Transgender
MAPPA	Multi Agency Public Protection Arrangements
NOMS	National Offender Management Service
OASys	Offender Assessment System
OM	Offender Manager
PPO	Prolific and other Priority Offenders

ANNEX 4

CONSULTATION ON NOMS WALES COMMISSIONING AND BUSINESS PLANS FOR 2008-09

Consultation Response Template

Please return your completed response form to:

Email: Sabrina.workman@justice.gov.uk

Address: NOMS Wales, Ground Floor East, Welsh Assembly Government Building, Cathays Park, Cardiff CF10 3NQ

Response From:

Name:
Position:
Organisation:
Address
Email:
Tel No:

Question 1: Given that, with the exception of capital projects, new or enhanced services can only be funded by efficiency savings or disinvestment in current services what current provision do you consider to be of low priority and could be reduced?

Question 2: What do you consider is working well in offender management in Wales and can be improved?

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Question 6: How can we improve and enhance alcohol provision to better meet the needs of offenders and reduce re-offending?

Question 7: In what ways can we work with courts and providers to consider alternatives to the use of unpaid work sentences that may not to be required to reduce re-offending, or be an appropriate punishment for offenders?

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Question 16: How can NOMS Wales ensure that reducing re-offending forms part of an holistic approach at an all-Wales and local authority level.

Question 17: How do we provide an effective connection with other partners commissioning plans to maximize outcome focused service delivery?

Any other comments: