

Summary of Responses to NOMS Wales Commissioning and Business Plan 2008-09 Consultation Paper

The NOMS Wales Commissioning and Business Plan consultation process, which took place between October and December 2007, sought the views of the Welsh Assembly Government and a wide range of other key partners and stakeholder organisations in helping to develop the final plan.

Our consultation sought comments to 17 specific questions relating to nine key commissioning themes. We are grateful to those organisations who responded and their comments have been helpful in preparing the final plan.

The following 21 organisations responded to the consultation:

1. Carmarthenshire NHS Trust *
2. Ministry of Justice, Public Protection Unit
3. Cymdeithas Tai Hafan
4. DIP South Wales
5. Kaleidoscope
6. Ceredigion Local Health Board *
7. Gwent Probation Area
8. HM Prison Service
9. The Fawcett Society
10. Swansea Community Chaplaincy Project
11. Jobcentre Plus
12. Partnerships Unit, Ministry of Justice
13. North Wales Probation Area
14. South Wales Police
15. Crown Prosecution Service, Wales Area Group
16. Welsh Assembly Government
17. Dyfed-Powys Probation Area
18. South Wales Probation Board
19. South Wales Police, Public Protection Department
20. North West Wales NHS Trust
21. Her Majesty's Court Service, Wales

* Response indicated no comments to offer

The following table provides a summary of the comments received.

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KEY AREAS FOR COMMISSIONING

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

Ref	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	- Less investment to the development of new 'innovative' provision if there is no sound evidence base that it will reduce offending more effectively. Very skilled Offender Managers can make the learning from the intervention more responsive to needs.
7	Gwent Probation Area	- Driven by these criteria it is proposed that Tiers 1 and 2 Community Orders would fall into the lowest priority category.
8	HM Prison Service	- The Prison Service is currently reviewing all the services that it provides this year and into 2008/09 and will be taking into account available resources & offender needs, with public protection as a priority.
10	Swansea Community Chaplaincy Project	- Using evidence from selected studies the following adult community-based interventions have been shown to be more effective at reducing re-offending than prison: <ul style="list-style-type: none"> • Residential drug treatment • Surveillance • Surveillance with drug treatment.
11	Jobcentre Plus	- We all need to be sure that we use what is already available rather than re- invent the wheel. A more cohesive approach could do much to ensure best use of resources and budgets.
13	North Wales Probation Service	-The Board hopes to see a significant remodelling of the central NOMS structure to reduce central overheads and bureaucracy in order to release funds to support delivery of offender facing services. - The current 'front loading' of targets has a perverse effect of increasing the demand for interventions. It drives volume at the expense of appropriate targeting and gatekeeping/prioritisation of resources. The appropriate measure would focus on the impact of interventions i.e. proportion of successful completions. - There should be a realistic debate within MoJ and between NOMS commissioners and sentencers about the 'demand' agenda. The projected funding cuts for the Probation Service will have consequences for the volume of interventions and community orders and custodial licences that can be managed to current specifications, consequently limits or rationing of disposals needs to be debated and agreed. - More recognition of the impact of some 'efficiency' measures needed. - A switch from a single focus on drugs to a greater focus on developing alcohol provision. - Review of Suspended Sentence Supervision Order single requirements and withdrawal of National Standards

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		would assist with increasing the capacity of offender management.
14	South Wales Police	- For this decision to be made a proper evaluation of current services should be conducted. As mentioned crime is reducing and we would have to weigh up the potential benefit to further crime reduction any new initiatives would have over already established practices that on the surface appear to be working.
15	Crown Prosecution Service Wales Area Group	- CPS does not have sufficient knowledge to respond to this question.
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - Increase use of Court Diversion provisions. - Read across YOT Diversion provision to adult CJS. - Court report requests on low risk offenders and/or reconfiguration of oral reports, FDRs and SDRs. - Reduction in community orders and prison licences for low risk offenders and/or shorter terms for statutory involvement. - Reductions in bureaucracy/audit/inspection would save resources, - Effective Sentencer liaison and effective policy emanating from the MoJ and Central Government regarding the prison population and the efficacy of community orders. Some Ministerial bravery is required so that policy is clearly explained to the general public and Sentencers.
18	South Wales Probation Board	<ul style="list-style-type: none"> - More sharing of commissioning process particularly between HMPS and NPS - Potential Tier 1 cases could be diverted via FDR but only if (a) access to mainstream services to meet assessed need can be more readily available and (b) negotiations are concluded with courts over projected need management as they perceive it.
19	South Wales Police, Public Protection Department	- Many low risk offenders emerging through the court processes with community penalties which require significant probation input. Could as easily be disposed of by way of financial penalty, conditional discharge or suspended sentence without a supervision element.
21	HM Court Service, Wales	All areas of working should be retained and in some respects improved. Processes should be enhanced to improve working methods, e.g. increased use of video links and increased video link facilities at prisons and at probation offices. Greater efficiencies could be achieved, for example, if processes were changed to ensure that for prisoners remanded after conviction pre sentence reports were prepared to enable courts to sentence in all cases within a week as a standard.

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Offender Management

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

	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	- An additional role of OM is building and sustaining motivation and ensuring learning from any interventions is applied in practice. OM is crucial in risk management. Also there is the role OMs have in contributing to MAPPAs.
3	Cymdeithas Tai Hafan	- Tai Hafan is proud of its excellent partnership working with Dyfed-Powys Probation Service in relation to the IDAP programme, where Tai Hafan staff work with victims of domestic violence. - Good communication and clarity around information sharing is vital. - Links with victims of crime are extremely valuable to manage offender behaviour and ensure safety of victims.
5	Kaleidoscope	- The Gwent DRR is working well and is providing value for money by treating people in the community rather than in a prison environment. - Longer orders would be helpful. - A graduation scheme where clients are recognised as coming through the programme would be useful for the wider community and for the client.
7	Gwent Probation Area	- The underpinning philosophy of the OMM, that resources and interventions should be weighted toward work with high risk/high criminogenic need offenders, is a familiar theme for the Probation Service and has assisted in the implementation of the Model overall. - Relationships between Probation Areas and the Prison Service in Wales work well and have been especially effective in embedding the Model. - All Wales OM Implementation Group has proved a constructive and helpful initiative. - The establishment of a women's prison in Wales is seen as essential and the absence in mid and North Wales of custodial institutions for male offenders continues to be problematical. - Communication with English prisons. - Engaging with Local Authorities in securing support for addressing criminogenic need.
8	HM Prison Service	- Partnership working with Criminal Justice Agencies and other Voluntary Sector organisations is improving and we would hope that this will continue.
10	Swansea Community Chaplaincy Project	- Excellent relationships are in place at HMP Swansea; excellent communication links are in place with Safer Swansea; Local Authority; SMAT; and Voluntary Agencies.
11	Jobcentre Plus	- There is scope for a co-ordinated approach to developing a more interactive relationship within Prisons and Probation to identify the range of support available for individuals and to set up a mechanism within each of

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		those organisations for the exchange of information and good practise between internal departments e.g. Resettlement and Education. This would help promote a better understanding of Prison and Probation routines for partners.
13	North Wales Probation Service	<ul style="list-style-type: none"> - The implementation of Phases I and II and the National Offender Management model has been successful. - Investment in prison build in North Wales would significantly enhance Offender Management and Through the Gate services, and generate substantial efficiency savings for the Area. - Development of Out of Hours/Weekend services. However this creates additional costs. - Services for short term prisoners (up to 12 months) need greater priority. - Focusing on needs of 18-25 year olds within the commissioning process and prioritising/incentivising services for this group would support reducing re-offending.
14	South Wales Police	<ul style="list-style-type: none"> - The multi-agency co-operative approach with all partners linking in at both tactical and strategic levels is working well. This incorporating the Substance Misuse and DIP programmes in particular tackling the root cause of offending although in its infancy can be seen as effective in reducing crime. - A major improvement would be to have closer alignment of the DIP programme with offender management, and to make the attainment of Drug Testing on Arrest a priority in this respect.
15	Crown Prosecution Service Wales Area Group	<ul style="list-style-type: none"> - The SORI Restorative Justice Programme is very effective in reducing re offending.
17	Dyfed-Powys Probation Area	<p>Working well:</p> <ul style="list-style-type: none"> - Victim contact services - Quality of OASys - OM Phase I and II - Implementation of NOMM - MAPPA - Statutory liaison regarding child protection, MAPPA, LSCBs etc. - SFO reporting systems. <p>- The next push will be to embed OM Phase III and scrutinise the implementation of the new National Standards. Please note that Wales Probation Areas all have an HMIP Offender Management Inspection in 2008/09 and full attention will be given to this. The outcomes will help to define improvements required.</p>
18	South Wales Probation Board	<ul style="list-style-type: none"> - More comprehensive information needed on mainstream services for OM referral access. - Streamlining of services with other Criminal Justice agencies would assist. - Increased flexibility of service provision -evenings and weekends - would be an improvement but requires resource and national and local negotiation to achieve greater workforce flexibility.

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		- Major concerns about gap in provision for short-term adult prisoners. Probation would want to have a central role in any development here so as to have it sit alongside offender management.
19	South Wales Police, Public Protection Department	<ul style="list-style-type: none"> - Co-located units such as the one in Cardiff work very well, at an operational level the opportunities to share information and pool resources in considerable. They also provide a more rapid response at a more appropriate level. - Prison facilities for females in Wales should be considered a priority - Greater provision should be considered for detention facilitates for young offenders in Wales. - In the short to medium term, greater emphasis should also be placed on the engagement of English prisons with the Welsh MAPPA process. - There are longer term opportunities for things to improve when probation/prison service become involved in and accustomed to ViSOR.
20	North West Wales NHS Trust	<ul style="list-style-type: none"> - Inter Agency working - Relationship with Prison (North Wales being Altcourse, Liverpool) - M.A.P.P.A
21	HM Court Service, Wales	Group work where possible in large, sparsely populated geographical areas.

Question Three: 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 the community, but the likelihood of them re-offending is high. Should we invest in working with this particular group of PPOs?

	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	- Target this group (less than 12 months) by developing an initiative to ensure PSR authors propose appropriately intensive communities sentences. A short analysis of PSRs on offenders sentenced to less than 12m has been undertaken, which suggested PSR authors could do far more to encourage community sentences instead of short custodial sentences.
3	Cymdeithas Tai Hafan	- Yes. Offenders who inflict abuse and/or violence upon current and former partners, often commit further assaults when their custodial sentence is less than 12 months. We would urge that work with this particular group of offender's and their victims, is increased. Offenders who breach the terms of their IDAP programme and who are given short custodial sentences as an alternative, view this as a "soft option" compared with being managed via the IDAP programme.
4	DIP South Wales	- Yes – By closely aligning the PPO service with the current and planned DIP provision in South Wales. Investing

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		in collocation of teams with CJIT and PPO workers and ensuring each CSP has a service delivery point.
5	Kaleidoscope	- This is essential particularly given re-offending rates of this group. In terms of drug treatment it is the only way they would be guaranteed treatment is some places in Wales.
7	Gwent Probation Area	- Yes: Given the huge rewards which could obtain from a more appropriate investment in PPO work it would be an opportunity lost if this area of work were not identified as a priority over the next several years.
8	HM Prison Service	- NOMS should be giving serious consideration to investing and addressing the criminogenic needs of specific groups of offenders including PPO's, sex offenders, IPP's and offenders who commit domestic violence offences.
10	Swansea Community Chaplaincy Project	- Yes; this group are the cause of a high level of crime and require intensive support from many agencies working in partnership. - A wide range of activities and accessible support can prove beneficial to a reduction in the risk of re-offending by this particular group.
11	Jobcentre Plus	- Investment in this group is certainly an important consideration which in the long term could have a very positive impact in reducing re-offending. - Much would depend on funding and resource and would need to involve close consultation with a range of partners
13	North Wales Probation Service	- There is scope for developing funding via CSPs. - We would see a role for the Reducing Re-offending Board to ensure that appropriate connections are achieved through joint commissioning via TSS, DIP and the Substance Misuse agenda as the appropriate approach to developing services and support for PPOs sentenced to less than 12 months.
14	South Wales Police	- Yes. They have been identified as a potential risk to the public, and there is an opportunity to intervene at an early stage of their offending cycle and prevent further recurrences, reducing then the burden on our core services.
15	Crown Prosecution Service Wales Area Group	- Yes, PPOs and PYOs are likely to be combined into one target group and investing resources in these groups would produce beneficial results. - NOMS must target short term adult prisoners both when they are serving sentences and on release to assist any realistic chance of rehabilitation and to break the revolving door syndrome of offending, prison, offending.
16	Welsh Assembly Government	We agree that there should be more investment in working with PPOs aged over 21 on sentences of less than 12 months, with perhaps a particular priority on those aged 21-25
17	Dyfed-Powys Probation Area	- This is a task for PPO Schemes in each Local Authority and any investment should be drawn from a wide constituency of organisations. Probation could contribute if provided with the additional resources so to do. - Probation Areas can probably best help through the development of DIP services, whose client group is likely to include many of these offenders.
18	South Wales	- This is already happening but financial recognition would be helpful in expanding it and embedding it in inter-

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	Probation Board	agency practice. - Part of this work could also be covered and expanded by ESF convergence funding if current bid is successful. - Can we also look to connectivity with TSS and DIP provision?
19	South Wales Police, Public Protection Department	- Given the age of the offenders their behaviour may well be engrained by this point in their lives. - A brave direction could be to only invest in targeting this group for enforcement rather than rehabilitation.
21	HM Court Service, Wales	Investment should be targeted on risk of harm but this may include supervising PPOs on post-release.

Targeting interventions at offenders who pose the highest risk of re-offending and causing harm

Question Four: 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?

	Organisation	Summary of Responses
4	DIP South Wales	- Ensure drug using offenders are offered an assessment and brief intervention by DIP on a voluntary basis if possible. - Align DRR and DIP post and pre release/sentence with the PPO process to ensure continuity for those de-escalating their offending patterns. - Internal distinction and division of probation resources. Duplicate the situation in some parts of the USA and have 'probation' and 'parole' officers?
7	Gwent Probation Area	- Revisiting the use of Attendance Centres for lower tier offenders may prove cost effective particularly if ACs were developed on a partnership basis. - The development of mentoring as an intervention for low risk offenders, using best practice examples from other initiatives. - The use of Community Enterprise/Social Enterprise partnerships, supported by clear protocols and shared objectives,
8	HM Prison Service	No comment from the Prison Service to this question, this appears to be an issue for the Probation Service although we would assist through partnership working.
10	Swansea	- The often untapped resource of the Faith/Voluntary Sector can be an excellent additional source to assist in

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	Community Chaplaincy Project	mentoring, befriending and advocacy for offenders as they work alongside the statutory agencies. Individuals in Tier 1 & 2 are ideal for the involvement of this grouping as they do not pose any high risk. - Reduction in the risk of re-offending is achieved by facilitating a successful transition from custody back into the community, Such assistance starts on reception to prison, and continues on a voluntary basis for up to three months after release.
13	North Wales Probation Service	- The Board would be concerned about steps to 'disinvest' resources from tiers 1 and 2 as the current focus on assessment of risk is relatively narrow. - There are potential risks in overlooking 'need' criteria and the potential for drift into further offending if relevant interventions (to criminogenic need) are not mobilised. - The use of some interventions could be enhanced if bureaucracy was reduced. - Flexibility to manage enforcement according to risk would free up resources. - There is scope for reviewing the potential for 'Charging' : Requiring offenders to pay for/towards their intervention where short, focussed interventions appropriate would enhance compliance and reduce resource demands.
14	South Wales Police	- The question is why they are tier 1 or 2. Is it the supervision already exists and this keeps them in check from developing into a greater risk. Any thoughts to removing this supervision must consider the long-term impact, without early intervention/supervision these could be the future tier 3 or 4 we are looking to supervise most closely. - We need to look at a structured prioritised approach to supervision, identifying key partners who can step in at lower level offenders including the voluntary sector to allow the greater skills and expertise to concentrate on the tier 3 or 4 offenders.
15	Crown Prosecution Service Wales Area Group	CPS do not have sufficient knowledge to comment
17	Dyfed-Powys Probation Area	- New National Standards should assist with a proportionate supervisory response to Tiers 1 and 2. - Use of Offender Supervisors with the NOMM provides the opportunity for releasing Offender Manager time and resources. - Referral to Key Workers in VCP sector could prove economic but the unit costings need to be evidenced as cost effective.
18	South Wales Probation Board	- Education of courts in relation to current NS requirements may divert some but we would want to work towards sub-contracting where orders are made so that criminogenic needs are met when statutory Probation funds need to be targeted elsewhere. - We also need to note that in terms of prevention, a proportion of SFOs come from lower tier cases. Risk is not static and maintaining an oversight of assessment beyond the minimum laid out in National Standards would

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		help in monitoring the risk and preventing escalation of offending and related increased risk.
19	South Wales Police, Public Protection Department	<ul style="list-style-type: none"> - The National standards for all Tier 1 and 2 offenders do not necessarily respond to the risk posed by the individual. Greater efficiency could be gained by a more flexible scale of interventions, shorter periods of supervision and the ability to more easily discharge orders when limited interventions have been completed. - The Criminal Justice Act now requires that when an order is breached, an additional requirement is added to the community penalty. It is often the case that chaotic or inadequate offenders repeatedly breach their order and therefore attract a scale of intervention not necessarily appropriate to their circumstances.
21	HM Court Service, Wales	The assumption of the question is that low risk offenders do not graduate to higher tiers; and does not recognise that work with those in lower tiers may prevent their re-offending and graduating to a higher tier.

NOMS Research and Development Statistics

Question Five: 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?

	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	<ul style="list-style-type: none"> - Many Offenders with drugs and alcohol problems can benefit from ETS. - This can be enhanced by good OM which focuses on the substance misuse.
5	Kaleidoscope	- Greater use of community facilities. E.g. the compass project in Newport which would benefit by a partnership approach particularly if any funding possible by reducing commitment else where.
7	Gwent Probation Area	- Identification of more relevant local area targets, as part of a shared SLA for Prison and Probation, which make reference to Probation Areas building upon Individual Learning Plans commenced in custody would be helpful.
8	HM Prison Service	- The Prison Service & Gwent Probation Service have already made inroads into improving join-up for staff & offenders and will continue to do so subject to resources being made available.
10	Swansea Community Chaplaincy Project	- A great deal of ETE improvement is achieved by the Faith/Voluntary Sector in the area of continuity from custody to community via Life Skills/coaching. This skill set enables offenders to become more confident (in control) of their situation whilst accessing more traditional ETE provision.
11	Jobcentre Plus	- Although it is acknowledged that much is done within prisons to address the basic skills issue, there needs to be a more effective system between prisons, probation, government department and community education in

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		sharing information on individual offender's achievements. An effective transition of educational achievements needs to be introduced between relevant organisations in order to prevent duplicating the same procedures
13	North Wales Probation Service	<ul style="list-style-type: none"> - There are problems with the exchange of 'eligibility' information between prisons and Job Centre Plus i.e. an offender cannot be registered prior to release which needs to be resolved. - There is considerable scope to develop 'through the gate' and community based provision via European Social Funding. - There is scope for improvement in pre release access to provision which current regulations block. - A significant proportion of offenders are economically inactive and are claiming Invalidity benefits or other benefits. - The opportunity for 'joined up' working between NOMS and the new Government initiative on Invalidity Benefit needs to be prioritised.
14	South Wales Police	- Can avenues be established where the community ETE provision is aligned and possibly integrated with the prison service, i.e. the training is provided at the prisons by the community teams.
15	Crown Prosecution Service Wales Area Group	- Through CSPs and presentation to LCJB
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - Boldly step into the concept of Community Prisons where there is a local provision of custodial services that connect to community provision of <u>all</u> criminogenic interventions. - Until then we need the read across between Prisons and Probation in terms of ETE providers etc. The PP/P Forum and/or the ETE Pathway should be able to take this forward in terms of any joint commissioning. <p>Requiring specific attention:</p> <ul style="list-style-type: none"> - The exchange of information through the transfer of Individual Learning Plans to Probation teams needs to be a routine occurrence. The involvement of prisons in England is essential. The development in England by the LSC of a database of offender learning could be a model, but the contractual ties with learning providers would have to be strengthened in Wales to ensure the information was used to create better accessibility. - Prison Learning departments should take more note when commencing an individual on a course of the potential for it to be continued in the community. - Many providers in the community are extremely positive about opening their door to offender learners, but a few are more reluctant to do so.
18	South Wales Probation Board	<ul style="list-style-type: none"> - Joined –up contracts or targets through the prison gate and facilitating registration and preparation for work must be a priority. - Investment in technology links for offender development work inside and on release.
19	South Wales Police, Public	- Without prisons in the local community it is difficult for internal ETE resources to link with agencies in the community to which the prisoner is being discharged.

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	Protection Department	- ETE could also be widened to diversionary activity schemes which also brings self respect and order whilst not necessarily linked to employment per se
20	North West Wales NHS Trust	- In-Reach - Effective Communication - North Wales Prison Facility
21	HM Court Service, Wales	This is a question of improving liaison that we are not qualified to answer within the context of prisons and probation.

Drugs and Alcohol

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

	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	- Models of Care definitions are needed initially. Dependant drinkers may need longer more structured treatment delivered by a specialist agency, whereas hazardous drinkers might benefit from brief interventions, which OMs can be trained to deliver.
4	DIP South Wales	- Ensure future investment and development of DIP encompasses alcohol referral pathways, especially in the custody suites at arrest. From July 2008 the new DIP service will include current arrest referral provision but will not be undertaking alcohol assessments and referrals. Each CSP/SMAT has been asked to fund a replacement out of money currently allocated. - Ensure probation substance misuse contracts with 'third sector' or voluntary sector providers are realigned/re-commissioned to focus on alcohol and probation /DIP alignment is reviewed to ensure CJIT teams work to address [non DRR] drug issues . - Ensure mental health and drugs services are joined up to address the issues of poly drug / substance misuse and co-occurring mental illness when manifested by service users.
5	Kaleidoscope	- Working with SMATS for jointly funded projects.
7	Gwent Probation Area	- Alcohol to feature more prominently in the Wales NOMS and WAG Substance Misuse Strategies and additional dedicated funding provided so that this area of work does not compete against a whole range of other local area funding priorities. - Links between alcohol [as well as drugs] consumption and mental health issues must be taken into account here and would be most effectively addressed within initiatives dedicated to the development of mental health

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		strategies and provision in Wales.
8	HM Prison Service	- NOMS needs to commission an in depth analysis of need in relation to alcohol related, violent offending and provide resources to address the identified outcomes.
10	Swansea Community Chaplaincy Project	- A dedicated service for this grouping of offenders is essential. Dramatic in-roads can be achieved via rehabilitation with integral community services being put into place for on-going support.
12	Partnerships Unit, Ministry of Justice	- Given that, on average, 65% of prisoners leave prison unsentenced or sentenced to less than 12 months, OASys provides only a partial picture of prison treatment need.
13	North Wales Probation Service	<ul style="list-style-type: none"> - Introduce AUDIT as the standard secondary screening tool for both Prisons and Probation. - Integrate alcohol within DIP to improve access to and provision of services. - Develop Arrest Referral scheme targeting alcohol abuse/misusers. - Review and clarify policy priorities for 'abstinence' model within delivery of service provision. - There is potential to build on the DIP and TSS convergence to develop alcohol provision. - Care needs to be taken to avoid an exclusive focus on tier 3 and 4 treatment provision. The Reducing Re-offending Strategy Board should therefore be supporting a cross sector approach to developing a range of interventions i.e. Via general practitioner to interview treatment provision.
14	South Wales Police	<ul style="list-style-type: none"> - Future strategies should be set with looking to align offender management and the Alcohol and drugs services through statutory and voluntary partners, to target the early symptoms of substance misuse. - Examine what other sources of information are available to identify alcoholism to allow for early intervention, such as fire service attending calls to homes where occupants are intoxicated, GP services and chemists.
15	Crown Prosecution Service Wales Area Group	<ul style="list-style-type: none"> - Consider the promotion of supporting initiatives e.g. plastic glasses only schemes have reduced incidences of serious injuries significantly. - Conditional Cautions may also be a suitable disposal in appropriate cases.
16	Welsh Assembly Government	<p>It is clear our views that substance misuse treatment in prisons lags behind that in the community despite the fact that a period in custody can offer a vital opportunity for prisoners to address their substance misuse problems. Options for alcohol treatment in particular are very limited. Where clinical treatments are offered these are sometimes limited to detoxification with no supportive cognitive behavioural or psychological treatments in place. Some prisons do offer psychological interventions aimed at prisoners but overcrowding and the resulting movement of prisoners around the prison estate often does not allow prisoners to complete programmes they have started. Welsh Assembly Govt keen to continue to work NOMS to press for improvements to the treatment options for Welsh prisoners across the prison estate.</p> <p>Crucially important that the commissioning of substance misuse services by NOMS is properly joined up with what is being commissioned by CSPs in the community, instances in the past where there this has not happened</p>

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		and this precludes any seamless transition from custody to community. We believe that investment in alcohol treatment pathways for offenders picked up via arrest referral (or at other points in criminal justice system) should be considered – along the lines of the Drug Intervention Programme, or as an addition to it.
17	Dyfed-Powys Probation Area	- Government has focussed attention on drugs (illegal substances) at the expense of services for misuse of alcohol. This policy needs revision. - Links should be made with the Health Sector and VCP sectors to obtain services (that we should not finance) and to commission services across organisations where appropriate.
18	South Wales Probation Board	- Funding to SMAT and DIP with Alcohol written into commissioning agreements - Increase mainstream health services and access to those for lower tiers
19	South Wales Police, Public Protection Department	- The provisions of WGCADA [West Glamorgan Council Against Drugs and Alcohol] is an excellent example of substance misuse intervention available from voluntary sector agencies. - Strategically, we should continue to address substance misuse as an agenda rather than separating to drugs AND alcohol misuse. - Need greater opportunities for cognitive behavioural interventions for the young [weekend/binge drinking] individuals whose behaviour is beginning to cross into criminality.
20	North West Wales NHS Trust	- A Substance Misuse Service (S.M.S.) issue
21	HM Court Service, Wales	Enhancing group work initiatives for alcohol offences.

Unpaid Work

Question Seven: 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?

	Organisation	Summary of Responses
7	Gwent Probation Area	- More opportunities identified to feed back to Magistrates and Judges on the amount of resources that are sometimes “wasted” on offenders who would be more properly dealt with via fines and discharges.
8	HM Prison Service	- The Prison Service would welcome meeting with other CJAs to contribute to the consideration of alternatives.
10	Swansea	This is an area that we have no personal experience of.

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	Community Chaplaincy Project	
13	North Wales Probation Service	<ul style="list-style-type: none"> - The Board believe that the current 'policy' of reducing the use of unpaid work should be reconsidered. In North Wales we have effectively managed year on year increases in 'demand' via the use of partner organisations and agency placements which have added significant value to the range of work available and outcomes for offenders and the community. Unpaid Work consequently should be seen and developed as an intervention that moves up the tariff rather than downwards with consequent investment. - There is scope for 're-positioning' Unpaid Work as a primary pathway for unemployed offenders and reducing the demand for employed offenders where sanctions such as fines, curfews would be effective alternatives.
14	South Wales Police	<ul style="list-style-type: none"> - If the capacity is available to use this means then it should be used. It will re-enforce the impact and harm the offending has had on the community, and deter the individual assessed as a low risk from continuing on a path of criminality.
15	Crown Prosecution Service Wales Area Group	<ul style="list-style-type: none"> - Through consultation with Conditional Cautioning Local Implementation Team to discuss the use of Conditional Cautions as an appropriate diversion from Courts in certain cases.
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - Conditional cautioning is an option - as part of a low risk offender court diversion strategy. - Courts are very keen on UPW (and not keen on fining those who live in poverty) so a push to reduce UPW hours may be viable. - UPW <u>is</u> regarded as a punishment, quite appropriately, and the public see this as positive and reparative. So, rather than knock it why not support it and place resources there as a matter of policy.
18	South Wales Probation Board	<ul style="list-style-type: none"> - Clarify NS requirements – campaign to raise the profile of the fine. - Get CSP and other sponsors buy-in to more funding of UPW because of its community benefit. - Unpaid Work has confidence of courts and communities and we should be seeking to re-focus, rather than reduce. - Use as an ETE mechanism, with a focus on employability preparation would enhance its attraction to courts and community safety partnerships.
19	South Wales Police, Public Protection Department	<ul style="list-style-type: none"> - greater use of financial and conditional discharge penalties. However, this should be preceded by tighter management of those options in order to raise their credibility with the courts and offenders. For example: fines are paid and if not, there are consequences. - Greater use of restorative justice programmes should be considered, particularly when linking into the needs of the victim.
20	North West Wales NHS Trust	<ul style="list-style-type: none"> - Possible referral to Offender Management Service
21	HM Court Service,	The first step is to provide evidence that the courts are using unpaid work inappropriately. No doubt the

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	Wales	<p>statistics show that there is increased use of unpaid work as an option and there has been a decrease in the use of the fine but can it be demonstrated that a fine or other alternative was a more appropriate sentence? If this can be evidenced either in specific cases or more generally then NOMs can encourage more appropriate targeting of community requirements by-</p> <ul style="list-style-type: none"> • Educating magistrates and judges. The provision of probation led training events has been sporadic; • Educate NOMs staff. The most effective way of ensuring that sentences and community options are appropriately used is by ensuring that Probation Officers and Probation Service Assistants provide effective advice in court and in their reports; • Develop good working relationships between NOMs staff providing advice to courts and the court staff, legal advisers, magistrates and judges. A culture should be developed where Probation officers and Probation Service Assistants are not afraid to engage in a dialogue in court with magistrates and judges about sentencing options and their recommendations. Where good dialogue exists based on a relationship of trust and confidence in probation staff then it is possible for the inappropriate use of community requirements to be discouraged whilst promoting effective sentencing; • Provide effective alternatives to unpaid work. Magistrates are unlikely to respond to demands to increase the use of fines and decrease the use of unpaid work unless it can be seen that the fine is an effective alternative. In many cases it is not, usually because the offender is unemployed, and the level of the fine that can be imposed does not reflect the seriousness of the offence; • Maintain confidence in supervision requirements. Magistrates have recently learnt that national standards only require two meetings between an offender and the supervising officer during the period of supervision where the offender is low risk (tier 1). If the court does not have confidence in supervision as a requirement there will be a tendency to add other additional requirements including unpaid work; <p>Courts always consider alternatives and unpaid work imposed in appropriate cases where the need for a punitive element is identified. The fact that the reconviction rates are lower may indicate the effectiveness of the disposal.</p>
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Through the Prison Gate working

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

	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	- 'Through the gate' working will be delivered if you deliver the Offender Management model as intended-so this should be prioritised.
3	Cymdeithas Tai Hafan	- By improving and increasing work with offenders via the Freedom Programme as is happening in Swansea and Cardiff Prisons. Brief, intensive work with violent offenders is more effective than work spread over a period of time.
4	DIP South Wales	- Ensure that CARAT and CJIT/DIP information gathered on drug dependant prisoners in the PALBASE and DIR information streams is available to probation staff within and external to the prison gates: facilitate effective sentence and post release planning. - Ensure that all staff in prisons are signed up to the DIP information sharing protocol. - Co-locate Probation and police staff with DIP staff to provide a seamless service.
7	Gwent Probation Area	- A continued focus on the shared delivery of accredited programmes [e.g. prisoners on ROTLS attending community based provision or offenders 'bussed in' to local prisons] is an initiative likely to promote inter-agency Prison/Probation confidence and, on experience to date, is capable of securing successful outcomes for both agencies. - Stronger links between CARATS and the DIPs are regarded as a critical need in relation to substance misuse, dependency, and sentence planning overall.
8	HM Prison Service	- Public Prisons Wales are already engaged in a number of 'through the gate' initiatives with CJA colleagues and the third sector and will continue to seek ways on which to build on this relationship, providing resources are made available.
10	Swansea Community Chaplaincy Project	- The success of any such system is linked to the relationship built up whilst in custody. positive findings in relation to post-release work by mentors suggest that, after they leave custody, ex-prisoners may benefit particularly from contact with people who have more time to pay attention to individual needs and whose distinctive contribution is often the provision of personal and emotional support
11	Jobcentre Plus	- We have long recognised that working in partnership is the way forward in helping our customers and in order to further develop these relationships we need to; - Support each other in developing systems and processes that will ultimately lead to a more effective route way for ex-offenders on release from prison into employment. - Aim to continually develop the relationships between partner organisations by working consistently and

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		<p>collaboratively to achieve the best use of resource for all.</p> <ul style="list-style-type: none"> - Recognise individual organisation aims, objectives and targets and support each other to achieve, thereby forming a true partnership agenda.
12	Partnerships Unit, Ministry of Justice	<ul style="list-style-type: none"> - specific reference to through the prison gate working on drugs should be included.
13	North Wales Probation Service	<ul style="list-style-type: none"> - More needs to be done to locate prisoners closer to their home area prior to release. - There is scope to develop short periods of unpaid work as a requirement of licenses and to develop its potential as a primary pathway in reducing re-offending. - Achieve improvements in connectivity between prisons and community i.e. prisoners released (ROTL) to participate in programmes. - The current opportunities for accessing European Funding to support through the gate working provides a real opportunity to develop a greater balance between resources invested within the prison and those invested to follow the prisoner into the community.
14	South Wales Police	<ul style="list-style-type: none"> - With the advent of the new Mental Health Act, re-offending amongst those with mental health issues must be loosely looked at. At present there are no adequate systems in place to reduce re-offending in this area, especially within the prison service. This area needs to be reviewed.
15	Crown Prosecution Service Wales Area Group	<ul style="list-style-type: none"> - CPS do not have sufficient knowledge to comment
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - Each RRS pathway needs to work on this through the eyes of commissioning. - HMPS and NPS to enjoin resources and target joint outcomes regarding reduced offending. <p>In order of priority:</p> <ul style="list-style-type: none"> - It is essential that homeless prisoners are assisted with housing, including closer links with the local authority and gate collections. - For unemployed offenders either finding work prior to release or treated as a priority by Job Centre Plus on release both in terms of receipt of benefits and more importantly through the transition into employment. - Debt problems. More work in prisons to address these problems to provide some form of stability on release would be useful.
18	South Wales Probation Board	<ul style="list-style-type: none"> - Joint appointments, e.g. of programme tutors to maximise flexibility of delivery and resource usage. Influence national codes and conditions issues to allow this. - Basing more programmes in custody or increased use of ROTL.
19	South Wales Police, Public Protection	<ul style="list-style-type: none"> - Greater emphasis on putting local people in local prisons wherever possible. - There may be opportunities to integrate prisons [as an organisation] into communities. - There should be a greater communication and co-ordination between forensic mental health services both in

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	Department	custody and in the community.
21	HM Court Service, Wales	With limited exceptions, such as the ones indicated, there is little awareness in the court of the extent of end-to-end working.

Question Nine: "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?

	Organisation	Summary of Responses
4	DIP South Wales	<ul style="list-style-type: none"> - Prison in North Wales for men and women - A female prison, or a female wing in South Wales. - Access for prison and probation staff to DIP database, PALBASE, to ensure effective care co-ordination.
7	Gwent Probation Area	<ul style="list-style-type: none"> - At least one additional prison in Wales with priority given to female offenders. <p>Undertake further research into the number of offenders from Wales who are currently in institutions in England and those from England who are currently incarcerated within Wales.</p>
8	HM Prison Service	<ul style="list-style-type: none"> - Although the prison population is at an all time high, we support the need to transfer offenders closer to their home community, at least, towards the end of their sentence. The needs of Welsh prisoners, as recommended by the Welsh Affairs Committee, would be of particular significance to any initiative.
10	Swansea Community Chaplaincy Project	<ul style="list-style-type: none"> - Many return to live in the community they came from. There is then a strong role for local organisations that are working within and understand these communities. - Faith communities are potentially valuable allies in tackling social exclusion, as they can provide access to some of the most marginalised groups in society. - Faith based values and identities can motivate individuals to be involved in their communities and in social action. - Faith groups have the ability to mobilise networks and relationships within communities.
13	North Wales Probation Service	<ul style="list-style-type: none"> - Investment in prison build in North Wales would significantly enhance the reintegration of prisoners and reduce re-offending.
14	South Wales Police	<ul style="list-style-type: none"> - Resettle and rehabilitate, ensure that the partner agencies understand the benefit of this.
15	Crown Prosecution Service Wales Area Group	<ul style="list-style-type: none"> - CPS do not have sufficient knowledge to comment
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - A bold new system of Community Prisons. - This could be linked to a network of Wales Community Justice Centres where we have co-location of not only

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		CJS agencies but other relevant service providers e.g. DIP, Mental Health Services for offenders etc. - Welsh prisoners to be repatriated to Welsh prisons. Establishment of a prison for females in Wales.
18	South Wales Probation Board	- HMPS flexibility in allocation of security classifications to establishments. Keep people local especially towards end of custodial element of sentence (not transfer to open conditions when we could use last weeks for through the gate programmes etc at local level. - Develop more AP type resource as part of continuum of provision in security terms.
19	South Wales Police, Public Protection Department	-Part time prison sentences served locally would allow offenders to maintain family and employment structures whilst serving their sentence and improving their prospects on release. - An incentive and sanction options would focus individuals on ETE programmes whilst in prison. - Closer geographical teams between probation and prisons areas would provide a greater opportunity for a better service to the offender and the community through a better understanding of the local issues.
21	HM Court Service, Wales	To develop more prisons in Wales, particularly for youths and females.

Question Ten: 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?

	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	- Not skimping on assessments as a way of trying to save resources. Prioritising and targeting (and from the Public Protection perspective, defensible decision making) can only happen following a proper assessment of risk and needs
4	DIP South Wales	- Access to probation and prison staff to PALBASE DIP system: improve care planning and communication.
7	Gwent Probation Area	- Prison population management should be based on offender need, not bed availability. That said, interventions for remand prisoners should be restricted to immediate needs, especially mental health and substance misuse issues
8	HM Prison Service	- The Prison Service already strives to make every effort to address the critical needs of all offenders using best practice guidelines by taking into account risk, public protection and sentence length.
10	Swansea Community Chaplaincy Project	- Skilled and systematic work with offenders in relation to thinking, attitudes and motivation as well as involvement in their practical problems alongside a genuine 'continuity' in work 'through the prison gate'.
13	North Wales	- A potentially significant proportion of remanded and sentenced prisoners will be engaged with or known to

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	Probation Service	different provider agencies. the focus needs to be on how this is identified and followed up to avoid fragmentation, duplication or disjointed delivery. - Prioritising this 'continuity of care' agenda within the and not reinventing or developing 'new services'.
14	South Wales Police	- It should include prisoners on remand, if they are first time detainees this may be the earliest opportunity to engage with them in some form of offender management programme, - To determine if the resources are used for the right interventions, we need to evaluate the current practices and see if it is working well, then why.
15	Crown Prosecution Service Wales Area Group	- CPS feel that this (interventions) should be available to all prisoners
17	Dyfed-Powys Probation Area	- This should all be hooked into the sentence plan and that requires implementation of OM across all prison cases that are coming out on licence. It also requires Community Prisons and video conference facilities. - Remand prisoners make up 20% of the prison population and are often on a carousel so it would be difficult to plan Interventions, especially when many of these take months to complete for any effective outcome.
18	South Wales Probation Board	- Risk assessment is key. – full OASys sharing - Use self-assessment section in custody, what do they think they need to improve their situation and prospects
19	South Wales Police, Public Protection Department	- More Sex Offender Treatment Programme's in the prisons - More anger management programmes to be available in the community. - All sentences should be 'front loaded', placing as many interventions as possible at the start of an individual's sentence. - Delivering interventions to those on remand would generally be a poor use of resources. The exception would be interventions for mental health which should be prioritised
21	HM Court Service, Wales	By early intervention with prisons developing personal plans with regular reviews

Diversity and Equality Issues

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

	Organisation	Summary of Responses
2	Ministry of Justice	- There is evidence that you don't need different interventions for different groups of offenders. What you need

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	Public Protection Unit	are skilled providers and OMs who can tailor the intervention to the specific needs of each offender. Developing gender or ethnic specific interventions is not cost effective and needs of minority groups can be better addressed in other ways.
3	Cymdeithas Tai Hafan	- The improvement in continuity of staff/professionals involved with offenders. If changes in key workers are necessary, greater care should be taken in informing offenders, victims and other professionals about this. Tai Hafan also welcomes the new NOMS programme specifically for women offenders and for women at risk of offended.
4	DIP South Wales	- Build a prison in North Wales for Young < 21s, adult men and women - Build a female prison, or a female wing in South Wales. - Access for prison and probation staff to DIP database, PALBASE, to ensure effective care co-ordination. - Ensure all vulnerable and hard to reach groups are identified and tracked effectively and offered support and triage upon release into their communities from a variety of interventions. - Ensure POVA training review of all CJ staff and facilitate this training as a priority. - Second staff to the 7 DIP delivery points in South Wales and utilise existing DIP estates to deliver the Turnaround project.
7	Gwent Probation Area	- Women: Cross-Area provision of women-only interventions. Women's Prisons in Wales. - Young Adults: Dedicated prison resources for young adults. - Vulnerable Adults: Enhanced mental health provision, both in prison and community. - Clarification of the responsibility and contribution expected of local Probation Areas in relation to the newly established Adult Area Protection Committees in each local authority area to achieve consistency and establish minimum standards of practice.
8	HM Prison Service	- NOMS should commission an in depth analysis before deciding the needs of these groups and then provide the appropriate funding.
10	Swansea Community Chaplaincy Project	- We do not have any relevant information to make an informed response to this question. We work with predominantly Adult Male Offenders.
11	Jobcentre Plus	- Identify the needs of the individual groups to determine what support is available through our Public, Private and Voluntary services. - Set up the mechanisms to develop a better awareness of the specific support available and identify a process of referral that will ensure a seamless service for these customers in preparing them for employment.
12	Partnerships Unit, Ministry of Justice	- There is no mention of men in North Wales.
13	North Wales	- Making the strategic policy links with Welsh Assembly Government Policy, either within the existing pathways

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	Probation Service	<p>or via the development of specific pathway i.e. 16 – 25 year olds.</p> <ul style="list-style-type: none"> - Currently there is little focus on specific groups of service users within the pathways and the current focus on maintaining action plans not outcomes does not support the prioritisation of the development of specific services. Use of wide comprehensive cross sector monitoring information should be a priority, along with the commissioning of research into the young adult within criminal justice provision. - There are relevant links with children and families, parenting skills and developing strategies within the Reducing Re-offending agenda and local multi agency strategies which should be developed within the next Reducing Re-offending strategy.
14	South Wales Police	<ul style="list-style-type: none"> - Each individual should be assessed upon entry into the prison system and needs identified that can allow for an appropriate plan and assisting agencies to be identified at an early stage.
15	Crown Prosecution Service Wales Area Group	<ul style="list-style-type: none"> - A female prison in Wales, intervention in mental health worker provision in police stations to identify offenders with mental health issues, a new prison in North Wales to house adult, female and young offenders with Welsh language facilities, access for families and professionals. Currently all North Wales prisoners go to prisons in England.
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - The publications referenced set out exactly what is required. - How organisations work together, obtain resources and co-commission the service provision. - Put the money on the table and colleagues will co-create the services needed. - Housing. Through Supporting People Planning Groups and Homelessness Forums the Probation Service must build relationships with local authority parties, and nationally with Welsh Assembly Government, to develop projects to meet the needs of these vulnerable groups. - Services which will assist individuals to play a full part in the community and so it is essential that there should be further development of projects to support the employment, training and education needs of offenders. - Employment must be the main objective of sentence plans for all offenders, recognising that through work and its consequential commitment to the community that they are most likely to maintain crime free lives.
18	South Wales Probation Board	<ul style="list-style-type: none"> - Flexible AP provision - Link to LA project planning and Supporting People strategy - The RRAP Pathways need to be given more scope to implement services and encouragement to achieve more joined up services across Criminal justice and devolved services
19	South Wales Police, Public Protection Department	<ul style="list-style-type: none"> - Additional investment should be made in domestic abuse and MARAC processes
20	North West Wales NHS Trust	<ul style="list-style-type: none"> - Increased working with Voluntary Agencies. - Communication with Mental Health & CAMHS service.

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		- Development of Low Secure Service. - Women's Issues education
21	HM Court Service, Wales	By providing a bail information service as a matter of routine for defendants appearing from custody on first and subsequent occasions.

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

	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	- What is the evidence to show that the 'Turnaround Project' reduces offending? Is it better than ETS plus more tailored OM? The same point applies to young offenders.
3	Cymdeithas Tai Hafan	- Continuity of key workers to provide long term involvement is valuable. Family mentors to work long term with the family unit would be beneficial.
4	DIP South Wales	- Build a prison in North Wales for Young < 21s, adult men and women - Build a female prison, or a female wing in South Wales. - Access for prison and probation staff to DIP database, PALBASE, to ensure effective care co-ordination. - Ensure all vulnerable and hard to reach groups are identified and tracked effectively and offered support and triage upon release into their communities from a variety of interventions. - Ensure POVA training review of all CJ staff and facilitate this training as a priority. - Second staff to the 7 DIP delivery points in South Wales and utilise existing DIP estates to deliver the Turnaround project
7	Gwent Probation Area	- Rollout of the Turnaround Project as a long term investment has to be referenced against the current environment and the anticipation that flat rate budgets will be the norm from now on. - Research evidence from the Turnaround pilot will be useful in determining what level of priority, and from where the funding will be available, should be offered to this initiative.
8	HM Prison Service	- Public Prisons Wales are already providing support to this project and is committed to any future developments.
10	Swansea Community Chaplaincy Project	- From working with Adult Male Offenders this is a difficult area to make an informed comment on, however if Community Chaplaincy aimed at Female Offenders was possible this would become just one way of improving the current situation.
13	North Wales	- There is greater scope for involvement of existing partnership organisations within this field.

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	Probation Service	Identifying and scoping provision within current proposals for Convergence funding. - Improve the focus on diversity outcomes within the next action plans for Reducing Re-offending Pathways.
14	South Wales Police	- There may be scope for police dept to link in with this area, such as domestic violence and public protection to offer advice and support. This could also look at the voluntary sector for a more sustainable long-term approach if a constant funding stream cannot be maintained. The education sector should play a big role, as statistics show that lack of education predominant amongst offenders.
15	Crown Prosecution Service Wales Area Group	- CPS do not have sufficient knowledge to comment
17	Dyfed-Powys Probation Area	- It requires a complete raft of wrap around services to assist female offenders to lead crime free lives. This should include the provision of supported move on housing and assistance with employment and training. - Turnaround needs to develop services which assist women to manage and improve the relationships they have with their children and where necessary to support women to come to terms with the difficult decisions which are in the best interests of the child and allow the woman to come to terms with this and develop into a stable role in the child's life. - women can be referred into the services delivered providing we are briefed properly - Offender Managers can incorporate the project into the sentence planning and can liaise with relevant NOMM Key Workers. - Links can be made with our local VCP organisations that link with women and issues of domestic violence etc
18	South Wales Probation Board	- Link to Approved Premises regimes in developing facilities. - Also top ensure more ownership and joined up approaches across local authorities and other agencies. - We do not necessarily need to invent new services to plug gaps, if we can work with others to re-assess current provision and access arrangements
19	South Wales Police, Public Protection Department	- Not familiar with the turn around project – hence not in a position to give an informed response

Question Thirteen: 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?

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	Organisation	Summary of Responses
3	Cymdeithas Tai Hafan	<p>- Improving services which provide a link to sign post/support on a continuum from offence, to release and post-release. They should be agencies with a proven track record in service-user involvement and which experienced in working in a range of cultural settings.</p> <p>- A perspective that sees the family as a unit will be valuable here.</p>
4	DIP South Wales	<p>- Effective monitoring of referrals into services, access of that service and retention in service of minority groups; make monitoring contractually and financially re-enforcing.</p>
5	Kaleidoscope	<p>- Problems come with ensuring the voluntary sector delivers a piece of work but the commissioners do not in effect run the service through the commissioning process. The way forward is to make sure that the commissioning is specific about goals, the end but allows flexibility and innovation as to how to reach that point. Good practice can also be promoted by NOMS in the voluntary sector.</p>
7	Gwent Probation Area	<p>- The requirement to engage with migrant groups who have settled in Wales. Translation costs, especially, are proving prohibitive and the exploration of a pan-Wales approach to this issue would almost certainly produce savings and support the continuance of a quality service to offenders, victims and their families.</p>
8	HM Prison Service	<p>- If NOMS are to commission services to carry out this work then we suggest an in depth audit into BME & minority group needs across the CJ system should be carried out before deciding the way forward.</p>
10	Swansea Community Chaplaincy Project	<p>- It is important to incorporate the Faith communities in this arena: there is no mention of this group within the consultation document which has serious implications. The role NOMS (Wales) sees Faith communities playing needs clarification.</p> <p>- The Government has pointed out that faith groups can play an important role in working towards three goals:-</p> <ul style="list-style-type: none"> • civil renewal (active citizenship), • strengthened communities, and participation in meeting public needs. <p>- A broader agenda for civil renewal is needed which recognises the value of citizen participation in its own right, and highlights the importance of building connections within and between communities as well as with Government. If citizen participation is to be promoted, then understanding the motivations and practices of engaged citizens on which civil society depends must be a priority.</p> <p>- Who in the faith sector is expected to do what – and why? How does NOMS (Wales) see the role of faith groups differing from that of other community bodies? To what extent does NOMS (Wales) understand what sort of support and resources they might need?</p> <p>- Faith-based organisations have common issues with the rest of the voluntary and community sector and could learn from each other. However, currently it appears unusual for faith groups to be plugged into formal structures. Research suggests a lack of understanding and low level of religious literacy among many statutory</p>

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		agency staff, in some cases amounting to prejudice against faith groups.
13	North Wales Probation Service	<ul style="list-style-type: none"> - This question appears to distort the national NOMS position which describes a commissioning framework which is "small" national and regional and identifies partnership working and 'local' commissioning as the way forward. - Local commissioning by Probation Boards is the most appropriate vehicle for developing local responses to local need and engaging with local users. - Local Areas need to be developing local policy and practice to support positive engagement with service users. The role of the commissioner in this process is to specify the criteria or standards that should be achieved/complied with within the SLA/contracting process.
14	South Wales Police	- Consider the creation of Independent Advisory Groups similar to those organised by the police services. Each prison or probation area could form one such group to advise and provide user representation in culturally sensitive areas within the prison population.
15	Crown Prosecution Service Wales Area Group	- In consultation with CSPs and LCJBs. Achieve publicity through awards ceremony.
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - Utilise the research being done in Pembrokeshire on the VC sector and services for offenders. Need to research via a survey of service users. - Probation Areas are continually trying to encourage and expand their commissioning in this area. - Further consultations and mapping exercises are likely to be of limited value
18	South Wales Probation Board	<ul style="list-style-type: none"> - Cooption from umbrella groups to Probation Boards and steering groups - Funding of staff secondments into these groups for development purposes - Of necessity, this should focus on local responses to local issues. - The regional role is in setting a context and identifying leverage for resources to deliver within a wider framework, via costed projects, worked up at local level.
19	South Wales Police, Public Protection Department	<ul style="list-style-type: none"> - Citizen Advice services would benefit from the opportunity to engage in this area of business. - There may also be opportunities for other minority support groups e.g.: MEWN, BAWSO, which could be embraced in a referral process via the Citizen Advice Service
20	North West Wales NHS Trust	<ul style="list-style-type: none"> - Financing Advocacy Services. - Engagement (Inter Agency Relationships) - Networking
21	HM Court Service, Wales	This is not within the expertise of the courts.

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Question Fourteen: 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?

	Organisation	Summary of Responses
4	DIP South Wales	<ul style="list-style-type: none"> - Service user consultation exercises undertaken by DIP south Wales have informed and been imbued into new service specifications. We would be happy to share with you any process. - Community research exercise currently being undertaken by the university of central Lancashire on behalf of WAG/DIP : BME retention and access in DIP services [Cardiff and Swansea] - Substantial statistical data gathered on all minority groups entering DIP and leaving DIP through PALBASE and DIR monitoring and KPI monitoring.
7	Gwent Probation Area	<ul style="list-style-type: none"> - We would suggest the All Wales EFQM Survey handbook as a useful source of this information.
8	HM Prison Service	<ul style="list-style-type: none"> - The Prison Service have a number of systems that monitor services and provide feedback from users.
10	Swansea Community Chaplaincy Project	<ul style="list-style-type: none"> - Agencies within the Faith/Voluntary sector do not have access to certain tools or information to record findings as NOMS (Wales) may require. - Qualitative research may contribute as much as quantitative measures do, to an understanding about what makes individuals re-offend or desist from crime therefore assisting in the development of effective services. - Any development of national targets and indicators should be paralleled by that of a national strategy for on-going research, in order to ensure that the two sets of data complement each other. - Local variation in offending should be one of the most crucial areas of interest for NOMS (Wales), so it is vital to attach local information, such as areas where offenders return to, level of support available in those areas, gaps in services, community resources etc
13	North Wales Probation Service	<ul style="list-style-type: none"> - Probation Circular 2007/10 - There are examples of excellence within Europe (Sweden) where users have developed self supporting membership organisations which could be explored and tested within Wales. - User engagement needs to be embedded into the commissioning process as a provider responsibility
14	South Wales Police	<ul style="list-style-type: none"> - Consider the feasibility of a workshop for all service users to consider this question and the best way to develop information sharing practices, and this could involve established user groups as well as independent advisory groups as mentioned earlier.
15	Crown Prosecution Service Wales Area Group	<ul style="list-style-type: none"> - From CSPs and LCJBs.
17	Dyfed-Powys	<ul style="list-style-type: none"> - A good practice guide, which includes examples from Welsh Probation Areas, has recently been published in a

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	Probation Area	Probation Circular (PC10/2007: Offender Engagement Good Practice Guide). - The Wales Probation EFQM Team has assembled a compendium of customer and stakeholder feedback and consultations. - In Dyfed-Powys Probation Area we have a register of customer and stakeholder feedback with all our surveys. - NOMS Central has commissioned research on offender feedback - Dyfed-Powys Probation Area has been assisting with this.
18	South Wales Probation Board	- SWPB research portfolio provides a number of resources and methodologies - Equality scheme actions
19	South Wales Police, Public Protection Department	- The OASIS self assessment feedback process at the end of supervision. No other exit interview structures are in place
20	North West Wales NHS Trust	- Audit. - Questionnaires. - Dialogue
21	HM Court Service, Wales	Through Area Judicial Fora and Probation Sentencer groups.

Welsh Language

Question Fifteen: 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?

	Organisation	Summary of Responses
7	Gwent Probation Area	- It is not a significant issue within this Probation Area and the needs of new economic migrants is currently more pressing. Other Areas, though, are facing significant and ongoing challenges in delivering a service to offenders and victims where Welsh is a first language. It would seem both fair and reasonable that dedicated, additional budget capacity should be made available for that purpose.
8	HM Prison Service	- We are currently working on a Welsh Language Scheme, in conjunction with the Welsh Language Board, which will address this issue.
10	Swansea	- The easiest way to obtain accurate information is to ask offenders who are facing linguistic challenges both

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	Community Chaplaincy Project	within prisons located in England as well as those within the Principality. This will provide evidence as to what infra-structure and what level of provision is necessary.
13	North Wales Probation Service	<ul style="list-style-type: none"> - This is a matter for the commissioner to specify within the contracting process and for the provider to demonstrate compliance with the required standard of delivery. - Formula the costs of compliance and delivery would need to be taken into account within future commissioning and contracting arrangements. - The four Probation Areas are currently engaged in an audit of Area Language Schemes with the Welsh Language Board. All providers should be required to evidence how they are monitoring need and the quality of delivery of services to Welsh speakers. - There is scope to improve the services available for Welsh speaking prisoners in Welsh prisons. - The development of a prison in North Wales would significantly enhance the provision available for Welsh speaking prisoners. - Welsh speaking prisoners in England should be located as close to Wales as possible and NOMS should require English prisons holding Welsh speaking prisoners to develop a Welsh Language scheme to enable prisoners to communicate with other Welsh speaking prisoners and their families in Welsh.
14	South Wales Police	- Select one of the Welsh prisons to be the sole receiving centre for Welsh speaking prisoners. This would be then more cost effective and easier to meet these requirements, rather than spread limited resources across a wide area.
15	Crown Prosecution Service Wales Area Group	- No need within scheme to offer Welsh Language services to prisoners outside Wales. Otherwise seek advice from Welsh Language Board.
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - The Welsh Language Board would assist with how to serve Welsh speaking prisoners in England. - Dyfed-Powys Probation Area identifies Welsh language needs but without sufficient Welsh language speaking staff to deliver services there is a fundamental difficulty. - there is still considerable resistance to getting NOMS Central documents like OASys and sentence plans and PSR templates translated at their cost. - The Wales Probation Areas have got the Welsh Language Board undertaking a review of their Welsh language services at the moment. - It is more important for efforts to be made to place Welsh offenders in Welsh prisons, rather than trying to provide Welsh language services in English prisons, which is likely to be a very expensive resource across a large number of prisons in England.
18	South Wales Probation Board	<ul style="list-style-type: none"> - Greater coordination - Shared language schemes and resources – peripatetic in Southern Wales - Written into equality schemes in English prisons taking Welsh prisoners

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19	South Wales Police, Public Protection Department	<ul style="list-style-type: none"> - Improved video conferencing systems would assist Welsh prisoners in English prisons would assist. - Desirable that police, probation and prison video conferencing facilities are compatible – at present that is not the case - If there were a greater population of Welsh speaking prisoners in Wales there would be fewer issues for managers in English prisons
20	North West Wales NHS Trust	<ul style="list-style-type: none"> - Encourage bilingualism (e.g. there are Bilingual signs in Altcourse) - More translation facilities. - Efforts are being made in Health and should be mirrored elsewhere
21	HM Court Service, Wales	<p>By identifying language needs at first point of contact and the recruitment of more Welsh language probation and prison officers.</p> <p>Defendants sentenced in Wales should be accommodated in Welsh custodial establishments with officers able to converse to them through the medium of the Welsh language.</p>

Joining Together in Wales to Reduce Re-offending

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

	Organisation	Summary of Responses
3	Cymdeithas Tai Hafan	- Because of over-crowding in prisons and shortage of resources, that offenders sometimes breach orders and are then not given clear messages or responses that reinforces that their behaviour is <u>wrong</u> . Clear boundaries and consistent direction around this area and clear consequences.
4	DIP South Wales	<ul style="list-style-type: none"> - Ensure probation and prison service representation at forums. - Ensure staff attending has a remit that meets the need. - Increased regional commissioning.
5	Kaleidoscope	- By being closer to the whole commissioning process. The problem at present is that LHBs and LAs are small areas which are not co-terminus with probation areas. WAG either needs bigger areas like probation or take a more strategic overview and looks at drug treatment in Wales operating in 4 or 5 areas.
7	Gwent Probation Area	- We might usefully look toward the English experience for best practice examples. The “fragmented” political arrangements so far as accountability for different areas of work is not helpful in Wales. It is potentially confusing and obstructive in designing an holistic framework.

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8	HM Prison Service	- Reducing Re-offending is a matter for all partnerships within the local community but will need to be formalized with local service boards.
10	Swansea Community Chaplaincy Project	- There is a risk becoming pre-occupied with defining models for delivering programmes to offenders, and losing sight of the wider influences in their lives. We must tailor our services to needs/wants of the offender, rather than expect them to fit into our understanding of what they require. we must adopt a more holistic and coherent approach when forming policy individually and at an all Wales local authority level
11	Jobcentre Plus	- Most organizations are already involved in contributing to the reducing re-offending agenda. - more needs to be done at a community level to support and promote the ex-offender programme and in developing relationships with local authorities that will help them understand the impact reducing re –offending has on society.
13	North Wales Probation Service	- All Wales: The existing Reducing Re-offending Strategy should be reviewed to determine what impact has been achieved on promoting joined up approaches to reducing re-offending. - Local Community Safety Partnerships have been an effective vehicle for local problem solving to reduce re-offending. A review of the Wales Community Safety Partnership forum should include scrutiny of the impact on reducing re-offending. - Local Criminal Justice Boards play a key role in supporting reducing re-offending and should be encouraged to demonstrate how they are supporting the Wales Strategy.
14	South Wales Police	- Market the benefits, and in particular the financial savings to the economy and to organizations by preventing and reducing re-offending. - A look by WAG at how it administers its funding streams, and to place a proviso when granting funds to organizations that their applications should address reducing re-offending.
15	Crown Prosecution Service Wales Area Group	- Through continued involvement in CSPs and LCJBs.
17	Dyfed-Powys Probation Area	- This is down to CSPs and LCJBs and integrating the RRS at local level. - Work is in hand, via the Director of Crime Reduction in Wales, to enhance these links. - We need to get out of endless meetings mode and into practical service delivery mode which has a direct impact on crime, the fear of crime and anti-social behaviour.
18	South Wales Probation Board	- Use CSPs as reference groups via Probation involvement, e.g. through PPOs
19	South Wales Police, Public Protection	- South Wales has a target for reducing re-offending, however, this does not translate to a lower local authority level target. Without targets at such a local level it would be difficult to effectively focus resources. - There should be an improved provision of quality data to community safety partnerships to advise them of the

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	Department	level of, type of, and cause of, criminality in their areas
21	HM Court Service, Wales	Through engagement with Community Safety Partnerships

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

	Organisation	Summary of Responses
4	DIP South Wales	<ul style="list-style-type: none"> - Employ staff who understand commissioning. - Ensure continuity - Ensure this is these peoples full time job, not tagged onto another role - Ensure probation and prison service representation at forums.
7	Gwent Probation Area	- We might usefully look toward the English experience for best practice examples. The “fragmented” political arrangements so far as accountability for different areas of work is not helpful in Wales. It is potentially confusing and obstructive in designing an holistic framework.
8	HM Prison Service	- We are committed to build on existing structure i.e. Reducing Re-offending Strategy Board, Pathway Groups, local CJA’s etc.
10	Swansea Community Chaplaincy Project	- Communicate, Consult, Resource, Allocate Responsibility, Equality
11	Jobcentre Plus	<ul style="list-style-type: none"> - By working in partnership with relevant organizations and recognizing their business aims/ objectives in relation to this and any wider agenda. - Wherever possible take measures to support these aims by helping each other achieve relevant business outcomes.
12	Partnerships Unit, Ministry of Justice	- Reference to meeting the wraparound needs of those with a drugs problem. An important role for joint-commissioning is to ensure that levers and incentives are in place to provide an appropriate level of wraparound services for offenders discharged/released into the community and who are undergoing treatment.
13	North Wales Probation Service	- Assess what impact has been achieved on the development of joined up commissioning at a national and local level and whether the emphasis on ‘action plans’ has promoted or diverted attention from joint development of services and commissioning.
14	South Wales Police	- Build this communication requirement into the NOMS strategy. This will include specific points of contact, and identify at what level and what is expected each user has in the scheme.

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15	Crown Prosecution Service Wales Area Group	- Through LCJBs.
16	Welsh Assembly Government	- The provision of accommodation and housing related support is having a positive impact on re-offending. There is an opportunity to look at retained PAGs so that there can be better co-ordination with commissioning through the Assembly's homelessness grants programme. - We need to ensure that Probation service commissioning requires co-operation with local planning mechanisms for housing from Probation Services
17	Dyfed-Powys Probation Area	- When we do know this it is a question of getting into co-creation and co-commissioning mode and/or accessing funding that brings together organisations who can manage the interventions corporately
18	South Wales Probation Board	- HMPS/NPS joint commissioning. Can we identify the impact in this achieved via the RRAP pathway groups. They should provide an increased opportunity for this
19	South Wales Police, Public Protection Department	- There should be greater engagement from the L.H.B.'s at both SMB and with the probation trusts. - There is currently no 'All Wales' strategic framework for MAPPA. Given that the guidance around MAPPA is national, it would seem appropriate to develop an All Wales structure. - A 'cross partner' performance framework for MAPPA should be developed on an All Wales basis which is supported through a formal agreement by all parties.
20	North West Wales NHS Trust	- Effective Inter-agency working. - Communication. - Information sharing (Data Protection Act notwithstanding)
21	HM Court Service, Wales	By identifying and meeting sentencers needs through attendance at Area Judicial Fora and Probation Sentencer groups.

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Any Other Comments:

	Organisation	Summary of Responses
2	Ministry of Justice Public Protection Unit	<p>The strategy should make reference to MAPPAs and to ensure that NOMS plays a full an active part in these arrangements as responsible Authorities and as a member of the SMB. I would also like to see something to confirm that only nationally accredited programmes for sexual, violent and domestic violent offenders will be commissioned and nationally agreed risk assessment tools used.</p> <p>I liked the genuinely consultative tone and clear lay out of this document. It also benefited from being succinct and jargon free. It seemed to have integrity about it-admitting that you can't afford to do everything, being realistic this situation is unlikely to change and confirming the need for priorities.</p> <p>I liked the introduction written in the first person and emphasising the need for this commissioning plan to link with commissioning within and external to the CJS.</p> <p>I agree you should divert low risk offenders away from commissioned services but you should sign post them to community agencies that can address their needs.</p>
9	The Fawcett Society	<p>We would like to welcome your recognition of the specific needs of women offenders, and the commitments made to commissioning services which will meet these needs.</p>
10	Swansea Community Chaplaincy Project	<p>It is important that NOMS (Wales) acknowledges the 'Third Sector', as the, 'Faith & Voluntary Community Sector'. The documentation of this consultation has no mention of Faith whatsoever despite copious references to this integral ingredient in the management of offenders historically, currently and into the future. NOMS (Wales) needs to understand its rationale for faith group involvement, questions such as:</p> <ul style="list-style-type: none"> • What sort of support might they need? • How does their role differ from that of other community bodies? <p>Faith groups exhibit at least three characteristics of particular significance.</p> <ul style="list-style-type: none"> • They speak of a holistic commitment to communities, rather than a concern with a specific issue or segment of the population. This stems from the importance of their 'faith mission' within the community, through service to local people and meeting needs through volunteering and social action. • Faith groups express embedded identities within communities, and are associated with long-term local commitment, perspective and presence. They have potential to make community ownership

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		<p>of civil renewal programmes easier, and to complement, if not challenge, shorter-term initiatives.</p> <ul style="list-style-type: none"> • And they are an expression of diversity, representing distinctive identities and with the potential to help validate – even celebrate – the diverse nature of communities. <p>NOMS (Wales) should realise the capacity of faith groups in their members’ skills, mobilising volunteers, and providing staff and venues, as well as their role in reaching socially excluded groups. This can be expressed as:</p> <ul style="list-style-type: none"> • ‘human capital’ (staff, volunteers, and members), • ‘social capital’ (networks of trust and reciprocity) and • ‘physical capital’ (community buildings and venues). • ‘spiritual capital’ (the energy that drives the group). <p>Faith groups are particularly relevant in engaging with disadvantaged communities which are traditionally ‘hard to reach’. NOMS (Wales) needs to also consider the extent to which faith groups are able to access NOMS (Wales) resources. Many faith groups feel that they are discriminated against when applying for NOMS (Wales) resources, possibly due to being a part of the Third Sector rather than statutory. The flow of resources needs to be mapped in order to establish what faith groups are already contributing and what additional resources are required to maintain, expand or redirect their work in consultation with NOMS (Wales). This reflects a unified understanding of <i>motivation</i> for involvement; the <i>capacity</i> of groups to engage; and a professional contribution to required <i>outcomes</i>.</p> <p>What is fundamental is the desire of the Faith Community to serve – this it can not do effectively without resources. This remains the challenge!</p>
12	Partnerships Unit, Ministry of Justice	<ul style="list-style-type: none"> - What about those released from prison unsentenced or sentenced to less than 12 months, this group, and in particular those with a serious drug problem, that NOMS must focus if it is to reduce volume re-offending. - The commissioning and business plan should focus on the case management of this group and work with the Drug Interventions Programme and with similar initiatives. - There should be separate sub-headings under diversity: <ul style="list-style-type: none"> • BME • Disability/learning difficulties • Lesbian/gay etc - A key omission in the consultation is around the provision of general healthcare services to those released from

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		prison.
13	North Wales Probation Service	<p>The Board has welcomed the invitation to contribute to this consultation process but does not believe that the consultation paper complies with criteria 2 in the Consultation criteria:- “Be clear about what your proposals are...”</p> <p>Consequently the Board seeks reassurance that once any proposals for changes/future commissioning have been identified and defined these will be the subject of further consultation</p>
16	Welsh Assembly Government	<p>We are aware of the fact that probation Boards will have protected status for three years on assuming Trust status, but the Welsh Assembly Government remains concerned about the potential impact of contestability in the future.</p> <p>We continue to be concerned about the insufficient capacity in the male prison estate in Wales, and the current lack of any capacity for female prisoners in Wales.</p>
17	Dyfed-Powys Probation Area	<ul style="list-style-type: none"> - There needs to be evidence in this document of added value being provided by NOMS Wales; what is the added value, has a cost/benefit analysis been undertaken and is there any scope for diverting resources from NOMS Wales into service provision? - Dyfed-Powys Probation Area will continue to concentrate on delivering both Offender Management and Interventions and will continue to leverage Best Value principles in our assessments of who is best placed to deliver the work. This approach underpins our Service Design and the implementation of the National Offender Management Model with its configuration of Offender Managers, Offender Supervisors, Key Workers and Case Administrators. - As is acknowledged Probation Areas across Wales have a good track record, as both lead providers and local commissioners, working with the voluntary, community and private sectors to reduce re-offending and protect the public. There may be scope for commissioning services on an all-Wales basis as a complement to and not substitute for local delivery. The trick will be to attain economies of scale without reducing efficiency and effectiveness of service delivery to offenders and victims in all our outlying localities, villages, towns and cities. - The CSR settlement for 2008/11 looks extremely challenging. Core services have to be maintained and just doing this will be difficult in terms of quantity and quality of service delivery. Joint endeavour to identify where and how we can dis-invest to reinvest or find efficiency savings is to be encouraged. Any potential for NOMS Wales to secure additional funding for additional capital spend or operational spend in support of new initiatives will be welcomed with open arms. - Continuity of priorities is also welcome given the following: <ul style="list-style-type: none"> o limited and limiting resources to deliver services o the pace of organisational change, which has to be effectively managed and therefore resourced o prescriptive frameworks in terms of operational practice, organisational models, employment practice

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		<p>and governance arrangements.</p> <p>- The challenge here is to maintain our strengths across Offender Management and Interventions in Wales whilst giving ourselves enough headroom for innovation and creativity. There are undoubtedly different and better ways of working collaboratively (Probation, Prisons, YOTs, VCP sectors, CJS, Health & Social Care Sector etc.). However, collaborative working also comes at a price and this should be factored in to our planning assumptions. We may need a profound shift in how structures, systems and processes are configured for joint enterprise to thrive</p>
18	South Wales Probation Board	<p>Tension between funding for core statutory activities and development of new streams. We need to clarify the former before we develop the latter. It would be helpful, once having developed specific proposals in the light of feedback given in this process, if there could be a consultation opportunity to develop strategies for delivery at local level, particularly in view of the emphasis on partnership and the responsibility of Area Boards/Trusts to be local commissioners.</p>
19	South Wales Police, Public Protection Department	<p>There are no specific performance targets relating to public protection issues and hence there appears to be a lack of funding to support this area of business.</p>