

Leaders' Committee

4 June 2019 – 11:30 am

At London Councils offices, 59½ Southwark St., London SE1 0AL

Refreshments will be provided

London Councils offices are wheelchair accessible

Labour Group:	Room 2 and 3	10:00
Political Adviser: 07977 401955)		
Conservative Group:	Room 5	10:00
(Political Adviser: 07903 492195)		
Liberal Democrat Group:	Room 4	10:30
(Political Adviser: 07858 924941)		
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Lunch will be provided in Room 4 for members after the meeting

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- TEC Executive – 7 February 2019
- YPES – 28 February 2019
- Grants – 20 March 2019
- TEC – 21 March 2019
- Audit Committee – 21 March 2019
- CAB – 15 May 2019

***Declarations of Interests**

If you are present at a meeting of London Councils' or any of its associated joint committees or their sub-committees and you have a disclosable pecuniary interest* relating to any business that is or will be considered at the meeting you must not:

- participate in any discussion of the business at the meeting, or if you become aware of your disclosable pecuniary interest during the meeting, participate further in any discussion of the business, or
- participate in any vote taken on the matter at the meeting.

These prohibitions apply to any form of participation, including speaking as a member of the public.

It is a matter for each member to decide whether they should leave the room while an item that they have an interest in is being discussed. In arriving at a decision as to whether to leave the room they may wish to have regard to their home authority's code of conduct and/or the Seven (Nolan) Principles of Public Life.

*as defined by the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012

Leaders' Committee will be invited by the Chair to agree to the removal of the press and public since the following items of business are closed to the public pursuant to Part 5 and Schedule 12A of the Local Government Act 1972 (as amended):

Paragraph 3 - Information relating to the financial or business affairs of any particular person (including the authority holding that information), it being considered that the public interest in maintaining the exemption outweighs the public interest in disclosing it.

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London Councils

Minutes of the London Councils Leaders' Committee held on 19 March 2019
Cllr Peter John OBE chaired the meeting

Present:

BARKING AND DAGENHAM	Cllr Darren Rodwell
BARNET	Cllr Richard Cornelius
BRENT	Cllr Muhammed Butt
CAMDEN	Cllr Georgia Gould
CITY OF LONDON	Catherine McGuinness
CROYDON	Cllr Tony Newman
EALING	Cllr Julian Bell
ENFIELD	Cllr Nesil Caliskan
GREENWICH	Cllr David Gardner
HACKNEY	Mayor Philip Glanville
HAMMERSMITH & FULHAM	Cllr Ben Coleman
HARINGEY	Cllr Joseph Ejiofor
HARROW	Cllr Graham Henson
HILLINGDON	Cllr Ray Puddifoot MBE
HOUNSLOW	Cllr Steve Curran
ISLINGTON	Cllr Richard Watts
KENSINGTON & CHELSEA	Cllr Elizabeth Campbell
KINGSTON	Cllr Liz Green
LAMBETH	Cllr Jack Hopkins
LEWISHAM	Mayor Damien Egan
MERTON	Cllr Stephen Alambritis
NEWHAM	Mayor Rokshana Fiaz OBE
REDBRIDGE	Cllr Kam Rai
RICHMOND UPON THAMES	Cllr Gareth Roberts
SOUTHWARK	Cllr Peter John OBE
SUTTON	Cllr Jayne McCoy
TOWER HAMLETS	Mayor John Biggs
WALTHAM FOREST	Cllr Claire Coghill
WANDSWORTH	Cllr Ravi Govindia CBE

Apologies:

BEXLEY	Cllr Teresa O'Neill OBE
BROMLEY	Cllr Colin Smith
GREENWICH	Cllr Danny Thorpe
HAMMERSMITH & FULHAM	Cllr Stephen Cowan
HAVERING	Cllr Damian White
REDBRIDGE	Cllr Jaz Athwal
SUTTON	Cllr Ruth Dombey
WESTMINSTER	Cllr Nickie Aiken

Officers of London Councils, Lord Alf Dubs, Eleanor Harrison OBE, CEO of Safe Passage, Melissa Caslake, Executive DCS Westminster Council/RB Kensington & Chelsea, and Ian O'Donnell were in attendance.

Before the meeting started, the Chair welcomed Cllr Jack Hopkins, the new Leader of the London Borough of Lambeth.

1. Apologies for absence and announcement of deputies

The apologies and deputies listed above were noted.

2. Declarations of interest

No interests were declared.

3. Minutes of the Leaders' Committee meeting 5 February 2019

The minutes of the Leaders' Committee meeting on 5 February 2019 were agreed.

4. Unaccompanied Asylum Seeking Children

The Chair welcomed Lord Alf Dubs, Eleanor Harrison OBE, Interim CEO of Safe Passage and Melissa Caslake, Bi-Borough Executive Director of Children's Services, Westminster City Council/RB Kensington & Chelsea, and asked Cllr Muhammed Butt to introduce the item. Cllr Butt informed the Committee that:

- He had recently met with Lord Dubs to look at ways of supporting asylum-seeking children recognising the need for councils to work together
- There was a need to re-energise the National Transfer Scheme to reach the commitment of 10,000 refugees by 2020
- It was important to look at ways in which councils can support the work of Lord Dubs, acknowledging the pressures they face in areas such as funding and housing
- There had been a positive meeting with the Minister, the Rt Hon Caroline Noakes MP, where there had been recognition of the issues and which had emphasised the need for boroughs to work together

Lord Alf Dubs then addressed the Committee:

- He acknowledged the work done by London boroughs to date
- Help was still required because of the position of children within camps

- There were two legal paths to allow refugee children to join their families; the section 67 (Dubs) amendment to the 2016 Immigration Act and the Dublin III Regulation
- He was keen to seek a commitment for accommodating 10,000 unaccompanied child refugees over 10 years
- Lord Dubs was also working in other parts of the country, for example Scotland, Northern Ireland and Jersey
- He recognised that local authorities' financial positions were difficult, and their concerns regarding mental health issues. He was keen to develop a best practice model in respect of mental health issues and invited Members to submit information that could help its development

Eleanor Harrison OBE, Interim CEO of Safe Passage, added:

- Safe Passage exists to open safe legal routes to sanctuary, not just to the UK
- A number of boroughs had already made contact with Safe Passage but Ms Harrison was keen to work with more
- Safe Passage was concentrating on moving around 400 children still in Calais, Greece and Italy
- Ms Harrison was keen to work with boroughs to lobby Government for an announcement on future resettlement schemes
- Safe Passage was also considering judicial review in relation to support for people with mental health issues
- Interest was being expressed from foster parents in relation to asylum seeking children and Safe Passage would be talking to boroughs about this
- While the constraints of local authorities were noted, it was important for boroughs to keep delivering in terms of numbers of children assisted
- Ms Harrison advocated sending a collective letter to Ministers lobbying for a steer in relation to the issue of future resettlement schemes

In response to an invitation from the Chair, a number of comments were made by members:

- Several Members had visited camps, had signed up to the *Our Turn* campaign and had committed to receiving asylum seeking children; it was important for all boroughs to participate

- Some children received were at the point where they were or would soon be of care leaver age, which placed additional financial pressures on local authorities, and funding was needed for care leaver support packages
- Issues of mental health support had been recognised and some boroughs had been providing support services
- Numbers of good quality foster parents should be grown to address the specific needs of asylum-seeking children
- There was a recognition that the requirements to accommodate children placed considerable strain on resources, although boroughs were willing to assist and continued to apply pressure to Government on this issue

The Chair invited Melissa Caslake from Westminster City Council/RB Kensington & Chelsea to respond to the comments. She informed Members that:

- Some work was being undertaken to help understand the impact on care leavers budgets, in that each asylum-seeking child costs approximately £30,000 a year over and above care leaver income
- She recognised the concerns about the lack of foster carers and the ability of boroughs to provide the services that asylum-seeking children need
- The ability to engage the whole country in the issue of supporting asylum-seeking children, and the impact on the National Transfer Scheme, has not been fully explored, in that one in three children are in London and most boroughs are over their 0.07% threshold
- The issue of full participation in the London rota, set up to support the pressure on Croydon by dispersing children across the Capital, needed to be addressed at a political level

In summary, the Chair noted:

- The willingness to help children was clear, although Members had shared real concerns about adequate funding and the need for fair and proportionate distribution of children throughout the rest of the country
- The need to find ways of working effectively with Lord Dubs and Safe Passage to lobby Government
- Support for a lobbying letter to Ministers jointly authored by London Boroughs, Safe Passage and Lord Dubs on the issue of future resettlement funding

Lord Dubs concluded that:

- The impact of the National Transfer Scheme was acutely felt in Kent as well as Croydon
- He would continue to push for the issues of unaccompanied asylum-seeking children to be embraced nationally
- The issues of care leavers and mental health considerations were noted and would be taken on board in his work, particularly the subtle requirements of mental health support in this area

Leaders' Committee endorsed the comments in the report and the continuing work of Lord Dubs and Safe Passage.

5. Children's Services Finance Pressures

In the absence of Cllr Nickie Aiken, the Chair introduced the report, noting:

- London is experiencing unprecedented financial pressure in children's services, particularly in children's social care and high needs
- a collective £112 m overspend on children's social care budgets in 2017/18 and a shortfall of £78 m in high needs budgets
- variation in spend across London, ranging from 4 per cent underspend to 35 per cent overspend
- there are examples of good practice in London that could be replicated elsewhere
- the number of pupils with Educational and Care Plans has increased by 16% since 2013/14
- ISOS has recently been commissioned to carry out a survey on behalf of London Councils and it's hoped that boroughs will engage with the policy recommendations arising from the results

Cllr Liz Green felt that focus should be on SEND services, as there was a clear picture of overspends in this area. Cllr Ray Puddifoot felt it important not to forget expenditure on Children's services in general.

Cllr Jayne McCoy wanted the report to explore the pressures of children being placed in more expensive independent placements and the impact on overall costs.

Cllr Ravi Govindia raised the issue of needing to work collectively in line with the Children's Social Work MoU and also felt that more publicity should be developed focusing on attracting people into social work.

Cllr Nesil Caliskan emphasised that in Enfield, a contributor to high SEND expenditure was transport costs. She wanted to ensure that, as well as focusing on overspends, the report looked at adequate in-borough provision.

Mayor Phillip Glanville felt that the report overly emphasised the issue as being one for boroughs to solve and take action on. There should be a clearer recognition of the problems caused by baseline assumptions about funding being incorrect, and the need to highlight that and lobby on it.

Subject to the inclusion of the points above, Members agreed to note the findings of London Councils' survey into Children's Services funding pressures and receive a further report on policy recommendations.

6. NHS Long Term Plan

Cllr Ray Puddifoot introduced the report, noting the key ambitions of the plan, and he:

- drew Members' attention to the evolving nature of NHS structures at sub regional, borough and sub-borough levels
- felt that the five London Councils nominees to the London Health Board members, each representing one of the STP footprints, had the potential to act as a conduit for localities
- updated Leaders on progress of the PrEP trial and noted the achievements boroughs had made on HIV protection rates
- mentioned new trials where drugs could be used to prevent the onset of HIV infection, although no money has specifically been allocated, and felt that some work could be done on this.

Members made the following responses:

- There were risks for boroughs in terms of the new NHS model; the rationalization of management structures and the need for the NHS to achieve savings indicated that

decision making may happen more centrally. It was preferable to see NHS leaders facilitating local decisions with boroughs

- A united funding approach to PrEP needed to be taken based on the success of the trials
- The coterminous nature of CCGs in the past has been successful
- The comments in the Long Term Plan about the potential changes in public health commissioning responsibility were unhelpful and should be revisited
- Any response to the proposals should be in a strong enough form that allows it to be visible to the NHS
- Members should consider attendance at CCG Boards, as a good platform for influence
- Responses should emphasise the importance of local authority involvement in the London Estates strategy

The Chair noted the general support from members on lobbying for funding for PrEP trials, and it was agreed that Cllr Puddifoot would write to the Secretary of State on this matter. It was also agreed that a response to Long Term NHS Plan should be made based on the discussion at this Committee.

7. Exiting the EU – Update on Local Engagement

The Chief Executive outlined the ongoing preparatory arrangements for exit from the EU via three areas: regional information sharing hub; the resilience contingency arrangements via the London Resilience Forum; and Ministerial engagement.

The Chair confirmed that he along with Cllr Coghill continued to attend the MHLG Exit Delivery Board.

Leaders' Committee noted the report.

8. Feedback from Joint Boards – Homes for Londoners Board (HfL)

Cllr Darren Rodwell fed back on the key outcomes of the most recent meeting of the HfL Board, namely:

- Spending review

- The potential impact of Brexit on housing supply

9. London Councils Priorities to 2022 and Business Plan 2019/20

The Chair confirmed that the priorities, comprising 46 different pledges, had been the result of discussions dating back to June 2018.

Members agreed London Councils' priorities to 2022, subject to periodic review, and the outline Business Plan for 2019/20.

Members agreed on the proposition to feature one group of pledges at each Leaders' Committee from June 2019.

10. Urgency report

Members noted the decision taken under the urgency procedure regarding the appointment of a new Deputy Chair for Leaders' Committee and a new Member of the Executive.

11. Minutes and summaries

Leader's Committee agreed to note the minutes and summaries of:

- TEC – 6 December 2018
- Grants Executive – 7 February 2019
- CAB – 13 February 2019
- Executive – 26 February 2019

The meeting agreed to exclude the press and public.

The meeting ended at 13:05.

Item		Action	Progress
4.	Unaccompanied Asylum Seeking Children <ul style="list-style-type: none"> • Letter to be sent to Ministers authored by London boroughs, Safe Passage and Lord 	PaPA Health and Adult Social Care	In hand

	Dubs regarding future resettlement funding		
5.	Children's Services Finance Pressures <ul style="list-style-type: none"> Members to receive further report on the policy recommendations for Children's Services 	PAPA Children's Services	To go to Executive in June
6.	NHS Long Term Plan Cllr Puddifoot to write to the Secretary of State regarding funding for the PrEP trials.	PaPA Health and Adult Social Care	In hand

Leaders' Committee

London Councils' finance lobbying strategy - update

Item 4

Report by: Paul Honeyben **Job title:** Strategic Lead: Finance & Improvement

Date: 4 June 2019

Contact Officer: Paul Honeyben

Telephone: 0207 934 9748 **Email:** paul.honeyben@londoncouncils.gov.uk

Summary

This report updates Leaders' Committee on the latest developments and activity in relation to the finance lobbying strategy agreed in June 2018. It includes updates on lobbying activity and progress since the last update in February 2019 in relation to Spending Review 2019, the Fair Funding Review and 75 per cent Business Rates Retention reforms.

Recommendations

Leaders' Committee is asked to:

- note the progress on finance lobbying with respect to the key events outlined in the report; and
 - write to local MPs to London Council's key Spending Review and Fair Funding Review lobbying priorities over the summer (paragraph 10).
-

London Councils' Finance lobbying strategy - update

Introduction

1. This paper updates Leaders' Committee on the progress with regard to London Councils' finance lobbying since the last update in February 2019. The next 9 months continue to hold a huge amount of financial uncertainty for London local government. The Spending Review, due in the autumn, is intended to set departmental expenditure limits for up to three years and determine the overall quantum of central government funding to local government. The Fair Funding Review, due to be completed by April 2020, will determine the new funding baselines within the 75% business rates retention scheme from 2020-21 onwards.

Spending Review 2019

2. The timing and detail of the Spending Review will have a significant impact on MHCLG's ability to deliver the other reforms by April 2020, particularly the Fair Funding Review. In the Spring Statement in March, the Chancellor confirmed the intention to hold a Spending Review in the autumn, with the official representation process due to start before the summer parliamentary recess (24th July). It was intended for the Review to cover the three years from 2020-21 to 2022-23, subject to an orderly withdrawal from the EU.
3. While the Chief Secretary to the Treasury recently confirmed the Treasury is still planning for a three-year review¹, it is increasingly likely that the Review may cover only one year. The Chancellor suggested a shorter review might be necessary when he appeared before the Treasury Select Committee in April². With the Spending Review likely to be in October/November, it is unlikely that any meaningful figures will be known until the provisional settlement in December. This is creating huge financial uncertainty for London boroughs, who will be starting the process of setting their annual medium-term financial plans with very little detail about almost all of the major funding streams in 2020-21.
4. Recent discussions with MHCLG civil servants have, therefore, focussed on what the priorities of local government would be for a one-year Spending Review, as well as what the knock-on impact might be for the Fair Funding Review and 75% business rates retention.

¹ <https://www.youtube.com/watch?v=fqaGg8OFCsA>

² <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/treasury-committee/spring-statement-2019/oral/100709.html>

5. Under the one-year Spending Review scenario, it is proposed that London Councils' priorities would continue to be:
- the immediate need to contain the looming national funding crises within children's services, and adult social care (while calling for longer term sustainable solutions);
 - the need to address the specific factors that sit behind London's homelessness crisis; and
 - to appropriately fund the very specific cost pressures related to Unaccompanied Asylum-Seeking Children and people with No Recourse to Public Funds, linked to London's greater levels of migration.
6. In addition, to more directly address the lack of certainty, it is proposed to call for as much clarity as possible, as soon as possible, over a number of different funding streams well in advance of the provisional settlement. These include, but are not limited to, the likely continuation and parameters regarding: Adult Social Care "winter pressures" funding; the Social Care Support Grant (announced as a one off grant for 2019-20 in Budget 2018); the Improved Better Care Fund; the New Homes Bonus; Public Health Grant (due to be "rolled in" to baselines under 75% business rates retention); Troubled Families funding; Flexible Homelessness Support Grant; the Adult Social Care council tax precept and indeed council tax principles more broadly.
7. There would perhaps be less scope for government to listen to any detailed arguments for longer term reform of council tax and business rates and further fiscal devolution, although they will still be made. Liz Truss, the Chief Secretary to the Treasury, has recently made positive statements about the need for greater devolution of taxes, suggesting that the next Spending Review period should be one of transition towards greater alignment of local accountability for raising and spending public money.

Lobbying activity

8. The "Investing in the future" campaign was launched in November 2018 at the London Councils summit³. A further briefing was published in January at an event hosted by London First with London business groups setting out the economic arguments for investing in London's public services. A half day event was held with London Funders in February at the Guildhall with key voluntary and community sector groups. The intention with both sets of stakeholders is to develop a broader coalition in order to influence the Review. With regard to the third set of key stakeholders that have been identified - Members of Parliament - London Councils recently submitted evidence to the HCLG

³ Available here: <https://www.londoncouncils.gov.uk/our-key-themes/local-government-finance/london%E2%80%99s-local-services-investing-future/london%E2%80%99s-local>

Select Committee inquiry into local government finance and the 2019 Spending Review in April⁴.

9. Further briefings in the *Investing in the future* campaign are planned to be published before the summer recess on London Councils' top priority areas: children's services (early June); adult social care (June/July); and homelessness (July). Given that the Treasury is undertaking a zero-based review of capital funding as part of the SR, London Councils and the GLA have agreed to develop some clear London-specific arguments in this area over the summer. A final detailed submission will follow ahead of the Government's deadline (likely to be September).
10. London Councils will continue to engage with London's business sector, voluntary and community sector (VCS) and London MPs as part of the campaign. With regard to the VCS, a joint letter with the sector will be sent to the Chancellor in late May. Further engagement is planned with business lobby groups, building on the recent [Treasury Select Committee joint submission](#)⁵, which will include another joint submission to the Chancellor in June. Spending Review lobbying will also be on the agenda when the London Business Board meets in June/July.
11. With regard to engaging MPs, officers met with the co-chairs of the London APPG in January and several briefings have been sent to all London MPs. The London APPG Summer Reception in June will provide a further opportunity to brief them. However, in order to fully harness their collective lobbying power, **it is proposed that Leaders write to their local MPs over the summer to reinforce the key Spending Review and Fair Funding Review lobbying messages.** London Councils will provide a template letter that can be adapted locally following discussion of the above proposals at Leaders' Committee. Further engagement is planned around the party conference season.

Fair Funding Review update

12. It remains the Government's intention to implement new funding baselines for all local authorities from April 2020 following its review of local needs and resources - commonly referred to as the Fair Funding Review (FFR). As referred to above, there is some

⁴ Available here: <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/housing-communities-and-local-government-committee/local-government-finance-and-the-2019-spending-review/written/100039.html>

⁵ Available here: <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/treasury-committee/impact-of-business-rates-on-business/written/99192.pdf>

uncertainty regarding what a one-year Spending Review might mean for the implementation of the FRR.

13. MHCLG's current proposed timeline for the remainder of the FFR is set out in Table 1 below. The next consultation, which had previously been intended to be published before the summer parliamentary recess, is now simply due "before the 2019 Provisional Settlement". Even under the best-case scenario, therefore, it is unlikely any meaningful funding figures for 2020-21 will be published until the provisional settlement.

Table 1 - Fair Funding Review – timeline to April 2020

Date	Milestone
Spring 2019	Analysis of consultation responses.
Spring/ Summer 2019	Further policy development, including on transition and implementation, in collaboration with technical working groups jointly chaired by MHCLG and the LGA.
Before the 2019 Provisional Settlement	The Government will publish a further consultation on the proposed reform of the system including details of implementation and transition
Winter 2019	Reforms to be implemented in 2020/21 announced.
Winter / Spring 2020	MHCLG will work with local authorities in helping them implement reforms, ready for 2020-21.

14. London Councils' response to the last technical consultation on the review, submitted in February 2019, raised concerns regarding:

- the size of the overall quantum of funding for local government;
- the lack of progress of the Review and the uncertainty this causes;
- the proposal not to include deprivation as a variable in the foundation formula;
- the proposals that homelessness and concessionary fares are funded by the foundation formula, rather than through separate formulae;
- the fact that UASC and NRPF will not be reflected through specific formulae;
- the evidence being used to justify changes to the Area Cost Adjustment;
- the lack of detail about the level at which notional council tax will be set and its potential distributional impact;
- the proposal to include parking income within the relative resources assessment; and
- the lack of specific detail about transitional arrangements; notably, the length of the reset period.

15. London Councils' Chair and Vice Chair met with the Minister for Local Government in March to outline the key areas of concern following the December consultation. This

meeting, and subsequent correspondence with the Minister (included at Appendix A), suggests there is still potential scope to influence the decisions relating to concessionary fares and homelessness (which are currently proposed to be included in the overarching foundation formula, proposed to be driven primarily by population) rather than to have their own specific formulae.

16. London Councils' lobbying priorities for the remainder of the Review are to:

- continue to press for deprivation to be reflected in the foundation formula and that measures within individual service formulae accurately reflect the impact of London's higher housing costs;
- seek to place sparsity and remoteness factors in proper, evidenced based context if they are to be further recognised within the Area Cost Adjustment;
- ensure that arguments around accurate measurement of population is promoted; and
- make an argument for concessionary fares and home to school transport being included as separate formulae, as well as homelessness (although recognising that the most effective use of effort with regard to the latter may be to lobby for adequate homelessness funding via the Spending Review).

17. Officers will continue to engage with and supply evidence to the MHCLG/LGA technical working group on these topics and to undertake broader campaigning, utilising the same three stakeholder groups as with the SR19 lobbying campaign. London Councils will seek opportunities to work with the GLA as well as with other local authority groups that have similar characteristics on particular issues in respect of the Review, most notably (but not exclusively) with other major urban areas. e.g. Core Cities /SIGOMA.

18. As set out above, the summer APPG reception represents a chance to engage London MPs on Fair Funding issues as well as Spending Review. The proposed exercise of writing to local MPs over the summer (paragraph 11) would be equally useful in raising Fair Funding issues.

75 per cent Business Rates Retention

19. The third major change to local government funding from April 2020 is the implementation of 75% business rates retention across the country. The Government had always intended to reset business rates baselines in 2020 (removing any recurring benefit from growth that individual authorities may have accumulated since 2013-14), but it also intends to increase the retention level from 50% to 75% nationally, as well as introducing

reforms that attempt to simplify the system and reduce the risks born by local authorities of business rates appeals.

20. The Government consulted on these proposed reforms in December and a summary of London Councils' key points was agreed by Leaders' Committee in February. In summary, the final response:

- reiterated London Government's ambitions for greater devolution of business rates, building on the 100% business rates retention proposals from 2016 and the current London business rates pilot pool;
- raised concerns about the lack of illustrative figures to indicate the potential impact on individual councils, and the uncertainty this causes;
- welcomed attempts to reduce the "cliff edge" caused by resets and supported phased resets, which seem to eliminate this completely– but with the need for more illustration of the impact on authorities;
- called for the levy on growth to be abolished completely;
- urged the Government to develop more direct financial incentives for pooling under the 75% scheme;
- welcomed the commitment to reducing volatility through removing the impact of appeals, but continued to raise concerns about the current performance of the VOA;
- broadly welcomed the proposed "alternative model" – but called for a more comprehensive illustration of how it will work in practice;
- raised concern about the impact of a "hard reset" in 2020 - which could cause significant volatility for a number of boroughs – and call for further clarity about any transition to new business rates baselines; and
- raised concerns about the longer-term sustainability of business rates as a tax and as a funding mechanism for local government.

21. The hard reset of baselines will pose a significant financial risk for boroughs that have experienced significant growth since 2013-14. Pushing MHCLG for clarity on how the reset will be calculated is, therefore, an immediate lobbying priority in order to gain greater certainty. As is the need for MHCLG to provide more detail about how the new system will work in practice, with a number of key elements currently unclear.

22. More strategically, there is a broader question that the Government must address in the next few months regarding pooling under the new system. London Councils and the GLA have raised concerns about the lack of direct financial incentives to pool business rates under the current proposals for the new system. There appears to be less appetite for

incentivising pooling across other parts of the country and so this is an area in which London Government will need to take a particularly robust position if it is to influence the reforms successfully.

23. London Councils and the GLA have been working closely with regard to business rates retention for a number of years. An ambitious set of proposals were put forward in 2016 in response to the Government's proposals which, at that time, was to implement 100% retention. A small working group of Leaders and senior officers (treasurers and chief executives) was closely involved in developing those proposals. That process of collaboration provided a platform from which to develop and negotiate the London 100% business rates retention pilot pool that began in 2018-19 and continued in 2019-20 (albeit at the lower retention level of 75%).

24. London's 100% business rates pilot pool has generated more additional funding than was previously forecast for 2018-19. The total net financial benefit to London Government is now expected to have been around £397 million to be spent on vital services and strategic growth projects that will benefit Londoners. The 2019-20 75% pilot pool is forecast to generate a further £171 million in additional net benefit this year, giving an estimated aggregate benefit over both years of £568 million. It is anticipated that further investment in growth projects of around £40 million will be made through the Strategic Investment Pot, building on the £46 million already allocated in 2018-19. Bids for the second round are currently being developed, to be submitted in September; evaluation, consultation and formal decision-making will be completed by December.

The success of the pilot pool, which has shown London's capability to work collaboratively through developing joint governance arrangements, has strengthened London Government's reputation and negotiating position with government on any further fiscal or service devolution. There is, therefore, strategic value in influencing the reforms to ensure that pooling is at least an option under the new scheme.

25. It is proposed to continue to urge the Government to develop more direct financial incentives for pooling under the 75% scheme. This will include, but not be limited to, calling for:

- a higher retention share for areas that pool;
- a preferential rate with regard to the new levy on "extraordinary" growth;

- a number of Central List items within London, such as the London Underground network, to be brought onto a London area list, with a London pool benefitting from growth on these items.

26. The Government has been clear that any reforms must fit within HMT's narrow definition of "fiscal neutrality". Given this definition, the proposals above run from least to most likely.

27. London Councils will continue to work to understand the basis of the proposed reforms to the system, to seek as much clarity as soon as possible about the potential for pooling under the new system, and to seek to influence the reforms such that pooling continues to be a viable option that benefits London boroughs strategically and financially next year. In agreeing to the pilot pool, Leaders specified that continuing the pool beyond two years would require a specific re-commitment. A further report will be taken to Leaders' Committee on this in the autumn when it is hoped more detail about the new system will be known.

Recommendations

28. Leaders' Committee is as asked to:

- note the progress on finance lobbying with respect to the key events outlined in the report;
- write to local MPs to London Council's key Spending Review and Fair Funding Review lobbying priorities over the summer (paragraph 11).

Financial Implications for London Councils

None

Legal Implications for London Councils

None

Equalities Implications for London Councils

None

Rishi Sunak MP
Minister for Local Government
MHCLG
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SW1P 4DF

Contact Barbara Salmon

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 .gov.uk

Date: 21st March 2019

Dear Rishi

Fair Funding Review – meeting 18th March 2019

Thank you again for your time and the very helpful discussion of your emerging proposals for the future assessment of local authorities' relative needs and resources. Your Ministry will have received London Councils' detailed submissions in response to the consultations on Fair Funding and Business Rates Retention, but we were grateful for the opportunity to highlight some of the key issues for London authorities. We also thought it might help to capture and amplify some of the main points of our discussion via this letter.

While recognising that the Government's financial planning is currently subject to wider political imperatives, we were pleased to hear the Chancellor's recent commitment to a three-year **Spending Review** and your corresponding support for multi-year settlements for local government. This is an important factor in helping councils manage the scale of the financial and service pressures we all face, and an important opportunity for local and central government to ensure that, in future, adequate levels of investment support effective and financially sustainable local services. Nonetheless, we discussed our priorities in the event that a shorter, one-year settlement proves necessary, and confirmed that our highest priority would be to address adequate funding for children's services – both social care and High Needs/SEND funding – in each of which London faces aggregate shortfalls of approximately £100 million. We recognise of course that education funding is not within the direct responsibility of your Ministry, but would be keen to continue the work we have been doing with your officials to support the case to your colleagues in DfE. In addressing pressures on children's services, it is also imperative that adequate funding is made available to meet the cost of supporting some of the most vulnerable in our communities, including Unaccompanied Asylum-Seeking Children and people with No Recourse to Public Funds (on which London boroughs spend over £100 million per annum).

In the absence of longer-term funding solutions, Adult Social Care continues to represent a significant challenge for London, along with councils in the rest of the country. Recent one-off grant allocations and the Social Care Precept have helped to ameliorate the financial pressure, but London still faces an anticipated shortfall of approximately £100 million next year.

In both children's and adults' services you recognised the importance of maintaining the capacity to fund preventative work, including the importance of Public Health, and

acknowledged the success that London has achieved with its approach to preventative services more broadly. That, along with strong political and professional leadership, has been an important element in London's ability to manage demand pressures in social care, reducing the actual spend per capita by 9% since 2010 (a 20% reduction in real terms).

In response to the **fair funding proposals** we welcome your determination to "follow the evidence" and highlighted four issues from our broader consultation response:

- The exclusion of **deprivation** from the foundation formula. The consultation document asserts that deprivation only explains 4% of the expenditure of services to be covered by this formula beyond population alone. However, the consultation does not specify which measure of deprivation was used in this analysis, and you will be aware that recent analyses have argued that deprivation drives a far higher proportion of spend – up to 40% in the analysis from the University of Liverpool. The Indices of Deprivation are a complex suite of measures, indeed MHCLG's guidance notes state that "Because patterns of deprivation across larger areas can be complex, there is no single summary measure that is the 'best' measure". Clearly some measure or measures are required which, as you said, need to be sufficiently robust, granular and transparent. You asked us to reflect on the sort of approach we believe could be considered and revert to you on that. If a measure of income deprivation is to be used, we would be keen to explore with you measures that adequately reflect the real income citizens have at their disposal after unavoidable costs of housing. The Income Domain within the Indices of Deprivation, for example, uses 60 per cent of the median income before housing costs as a cut-off point for income-deprived households in receipt of benefits: we would like see consideration of a measure after housing costs, which would echo the IFS's analyses of poverty and deprivation after housing costs.
- The inclusion of **homelessness and concessionary fares** within a foundation formula that does not recognise deprivation. The incidence of homelessness is clearly related to deprivation. While, as you indicated, a significant proportion of funding currently comes not through the existing core funding formula, but through other grants, the combined effect still does not take adequate account of the demand and cost pressures driven by London's property market. As a result, London currently faces an aggregate annual shortfall in funding for supporting homeless families of approximately £170 million. Concessionary fares and – as you mentioned – home-to-school transport represent significant financial pressures for London boroughs (of around £460 million per annum) and, while we recognise the need to balance accuracy and simplicity in the overall funding formulae, we would be keen to help explore ways in which these pressures can be appropriately recognised in future.
- In relation to the **area cost adjustment** we were again pleased to hear that labour and property costs would remain the largest factors, although we would urge you to consider wider property cost measures than commercial business rate valuations. We welcome your reassurance that there would be no single ACA applied across all services, but that the measures used – and the weightings applied to them – would be appropriately tailored to each of the service formulae. This level of analysis was not, of course, included in the recent consultation, and we look forward to seeing exemplifications of these more detailed proposals as soon as possible.

- Finally, we emphasised our opposition – along with the Local Government Association as a whole – to the proposed inclusion of **parking income** in the “resources” element of the future formula.

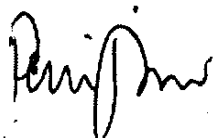
The forthcoming spending review – even if it proceeds as outlined – will not report until the Autumn Budget, which we would assume will be in November. Consequently, the first sight of robust exemplifications of council funding levels in 2020 is likely to be December 2019. We would therefore urge you not to wait for the control total to be finalised before setting out the more detailed options - and exemplifying their distributional impact – emerging in response to this round of consultation.

On the proposals for **business rates retention**, we emphasised our desire to continue the effective work that we had been able to do through the retention pilots agreed with Government. In the current year, the pilot has enabled approximately £150 million of additional investment by London Government in driving economic growth, leveraging a match funding of over £650m. But maintaining a pool across the whole of London is not straightforward, and we are keen that the new system to be introduced in 2020 continues to offer incentives to encourage authorities to work together through pooling. You said that you were open to ideas that were “fiscally neutral”. In the context of promoting growth, of course, the concept of fiscal neutrality is not entirely straightforward: the primary purpose of the Government’s policy, which we share, is to incentivise the promotion of economic success, and hence growth in the tax revenues that would not otherwise be available.

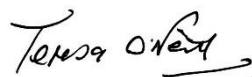
In response to your request on this, we would mention one proposal which we floated with your officials during discussions on the retention pilot for the coming year – but which we were not able to pursue due to Brexit-related time constraints around the November 2018 Budget. That was for London to be able to retain a greater level of growth than 75% in return for negotiating a bespoke levy arrangement that would effectively cap the overall potential benefit for London. In terms of possible incentives that are not directly related to the level of retention, we would want to return to some of the broader ambitions for devolution of control of business rates to London that we presented to Government in response to the original consultation in 2016. We would be happy to continue exploring these options with you and your officials.

Thank you again for your time and consideration. We are keen to continue to work together to help reform the way local government raises and receives funding, in order to underpin a successful and sustainable future for the local services our communities need.

Yours sincerely



Councillor Peter John OBE
Chair of London Councils



Councillor Teresa O'Neill OBE
Vice Chair of London Councils



Ministry of Housing,
Communities &
Local Government

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Our Ref:4145719

- 3 APR 2019

Dear Cllr John and Cllr O'Neill,

Thank you for your letter of 21 March, following our meeting of 18 March regarding your proposals on business rates retention reform and the review of relative needs and resources.

I would like to begin by thanking you for your continued engagement with these reforms, including through London Councils' work in our technical working groups and steering groups, and in responding to both consultations.

I also welcome your further reflections following our meeting, including potential approaches to measuring deprivation, which we will carefully consider as part of our work to shape the next phase of these reforms.

Regarding homelessness and concessionary travel, I am committed to engaging further with the views of all local authorities, and so I will undertake a further and more granular consultation prior to making a final decision on our approach.

In relation to the issue of how the area cost adjustment reflects wider property costs, we have used as our source data in the rates cost adjustment the Valuation Office Agency's detailed database of property valuations, which is a sample of all buildings. We have taken this approach partly to maintain incentives for local authorities to exercise pay restraint as using councils' rent bills would compensate authorities which have chosen to pay above the local going rate. I aim to publish a technical paper later this year, which will provide further detail on the area cost adjustment.

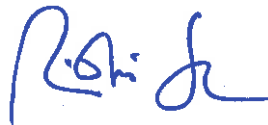
I also recognise your arguments for not taking parking income into account and will take your views on board alongside the analysis of responses to the review.

I understand the very real implications for the sector of any decisions relating to the Spending Review and the value of multi-year settlements. The Review provides us with the opportunity to look at local authority funding in the round and my Department has already begun preparations for the Review. As part of our planning, we are working closely with Departments across Whitehall, including the Department for Education and the Home Office, to build the necessary evidence base on service costs and pressures.

I was pleased that London accepted the offer to continue as a 75% business rates retention pilot in 2019-20. We value the joint governance arrangements for decision making that have been established through the London Congress and are pleased to see these continue from the current pilot. We are keen to see further progress in deepening the effectiveness of cross-London governance and joint working.

As you will be aware, the December 2018 consultation on business rates reform sought views on fiscally neutral measures to incentivise pooling in the reformed system. We will consider all the responses to the consultation – as well as the proposals put forward in your letter – very carefully before reaching any final decisions on possible incentives for pooling. We are still open to discuss any fiscally neutral proposals that you may have for incentivising pooling in more detail.

I would like to thank you for meeting me to discuss these important matters and I look forward to continuing our work together.



RISHI SUNAK MP

Chief Executive's Office

- 6 APR 2019

RECEIVED

Leaders' Committee

Pledges to Londoners - Update on Progress in Transport and Environment

Item no: 6

Report by:	Katharina Winbeck and Spencer Palmer	Job title:	Head of Transport and Environment and Director, Transport and Mobility
Date:	4 June 2019		
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Summary: This paper provides an update on the Transport and Environment pledges agreed by Leaders' Committee as part of its wider Pledges to Londoners.

Recommendations: Leaders' Committee is asked to note and comment on this report.

Introduction

1. As London grows, pan-London transport infrastructure improvements are essential to ensure growth without environmental damage or harm to health. Yet it is local interventions, service design and urban planning that creates a liveable city that, for instance, makes walking and cycling accessible to all.
2. The following pledges were adopted by Leaders in the Transport and Environment policy areas:
 - i. Support the promotion of a new Clean Air Act and the introduction of ULEZ across much of London to protect Londoners from harmful polluted air.
 - ii. Deliver at least 2500 charging points for electric vehicles by 2022, including the option for 20 rapid charge points in each borough.
 - iii. Work towards including a target of one tree for every Londoner in our local plans.
 - iv. Hold TfL to account for improving the bus route network in every London borough.
 - v. Lobby for improved certainty and levels of local road funding through TfL's LIP process.
 - vi. Press for London borough representation on the TfL Board.
 - vii. Create, cost and lobby for a programme of local transport infrastructure delivery; addressing enhanced connectivity, platform extensions and related responses to growing demand.
 - viii. Lobby for the delivery of major transport investment including CR2, HS2, Euston redevelopment, Bakerloo Line extension, West London Orbital and Tram network.
 - ix. Work to agree new forms of London borough influence on the specification, management and award of rail franchises so that the borough voice is at the heart of commissioning; and argue for further devolution to London.
 - x. Lobby for fiscal devolution of transport taxes including a proportion of VED to help fund highway maintenance, and new fiscal levers to unlock home building.
3. The delivery of these pledges is being overseen by the Transport and Environment Committee (TEC). They reflect shared pan-London priorities for Leaders over the next three years but the list does not reflect the entirety of TEC's workplan for this period. TEC has also a wide range of policy, project and service delivery responsibilities described in detail in its annual business plan.

Progress Update

Air quality

- i. Support the promotion of a new Clean Air Act and the introduction of ULEZ across much of London to protect Londoners from harmful polluted air.
 - ii. Deliver at least 2500 charging points for electric vehicles by 2022, including the option for 20 rapid charge points in each borough.
 - iii. Work towards including a target of one tree for every Londoner in our local plans.
4. London Councils is working with the City of London Corporation on an “Emissions Reduction Bill” as well as with the GLA and Defra on the content of the wider Environment Bill, which will include a section on air quality.
5. A draft “Emissions Reduction Bill” has been agreed at London Councils TEC and the City of London Corporation will shortly be undertaking a period of wider consultation on the proposals before finalising the drafting of the Bill. The City of London Corporation hope to gain the support of the House of Lords to submit the proposal to the House in the next Parliamentary session (which has now been delayed due to the delay of the Queen’s Speech).
6. London Councils and GLA are both part of the Department for Environment, Food and Rural Affairs (Defra) Clean Air Legislation Contact Group, which was set up as a sounding board on specific areas that will be addressed within the upcoming Environment Bill. This has been an excellent opportunity to engage with and lobby central government on London local authorities’ behalf.
7. TfL and GLA have committed to working with London Councils and boroughs on the details of implementing the extended ULEZ in 2021, with a particular focus on communication, which will need a much longer lead in time than the current, central ULEZ.
8. London’s Go Ultra Low City Scheme (GULCS), a joint initiative between London Councils, TfL and the GLA, aims to make London the Ultra-Low Emission Vehicle (ULEV) capital of Europe. The project aims to encourage the uptake of electric vehicles (EVs) by installing charging infrastructure across London. By the end of August 2019, over 1,700 EV charging points will have been installed for the use of residents without off-street parking in London. It is anticipated that there will be a second round of funding later in 2019 that would take this figure to over 2000 charge points before the end of 2020.
9. Currently, approximately 170 rapid charging points have been installed in London, with the vast majority on the Transport for London Road Network (TLRN). So far 26 boroughs have submitted lists of 20 potential sites for the installation of more rapid charging points on

borough roads and approximately 2-3 of these will be progressed with TfL in each borough. TfL and the Mayor are keen to have at least 2-3 sites within every London borough.

10. The GLA, through its London i-tree report, estimate that there are around 8,400,000 trees in London. Given the current London population is around 8,900,000, an additional 500,000 trees are currently needed to achieve this goal. The Mayor has funded the planting of 175,000 trees since 2016 and officers loosely estimate a total yearly planting rate of about 100,000 trees across London (this number does not take the number of trees that have been felled into account).
11. There are several challenges in tracking actual tree numbers. Boroughs have a number of different approaches for recording trees in their area and many trees planted are done so by private individuals, developers or land owners. Officers will look to establish a borough baseline and work with borough colleagues to ascertain how the commitment to have this feature in local plans is being progressed.

Working with TfL

- iv. Hold TfL to account for improving the bus route network in every London borough.
 - v. Lobby for improved certainty and levels of local road funding through TfL's LIP process.
 - vi. Press for London borough representation on the TfL Board.
12. London Councils engaged extensively with TfL on its numerous bus reviews and submitted consultation responses signed off by London Councils TEC. This has resulted in TfL's commitment to address accessibility issues at interchanges and analyse and mitigate the impact interchanges could have on the use of the Hopper fare. TfL has confirmed that there will be refunds for customers on bus routes which are being significantly curtailed and where the Hopper fare is exceeded. TfL has also listened to comments on specific routes and has decided not to go through with the changes to routes 19 and N271 and has made changes to numerous others. London Councils will continue to engage with TfL on the wider bus network and argue for an increase in service provision in areas that need it.
13. TfL's business plan, including LIP funding, is a standing item on the agenda with TEC's quarterly meetings with the TfL Commissioner. In addition, an officer group made up of London Councils senior officers, borough finance and regeneration directors and senior TfL representatives meet regularly during the preparation of TfL's business plan with the view of being kept informed and also influencing the way in which TfL is making its funding decisions. The group was initiated last year and has already reflected a number of the

agreed principles. For example, TfL now understand that certainty of funding is very important to boroughs, hence any cuts of LIPs core funding hits harder than cuts in additional funding pots that need to be bid into. TfL has also responded to lobbying about enabling a year on year carry over of some funding, which provides boroughs with more flexibility in delivering their projects.

14. In November 2018, London Councils sent a letter, signed jointly by the chair of TEC and the London Councils Chair and vice-chairs, to the Deputy Mayor for Transport, Heidi Alexander, asking for a standing borough representative on the TfL Board. The Deputy Mayor has agreed to include the option of borough representation in the next governance review of the board, which is starting this summer and should be completed in the autumn of 2019.

Transport Infrastructure delivery and devolution

- vii. Create, cost and lobby for a programme of local transport infrastructure delivery; addressing enhanced connectivity, platform extensions and related responses to growing demand.
 - viii. Lobby for the delivery of major transport investment including CR2, HS2, Euston redevelopment, Bakerloo Line extension, West London Orbital and Tram network.
 - ix. Work to agree new forms of London borough influence on the specification, management and award of rail franchises so that the borough voice is at the heart of commissioning; and argue for further devolution to London.
 - x. Lobby for fiscal devolution of transport taxes including a proportion of VED to help fund highway maintenance, and new fiscal levers to unlock home building.
15. London Councils officers are working with borough colleagues to establish a baseline of both local and strategic transport infrastructure that is required to meet boroughs' ambitions for good growth. This baseline will be important to further the lobbying efforts and ensure it is targeted appropriately. Funding is a huge challenge in this arena, particularly now that Crossrail will take funds from the agreed mechanisms, such as Mayoral Community Infrastructure Levy (CIL) and Business rates supplements for another considerable time period.
16. Previously, both TfL and DfT officials were supportive of devolving some rail responsibilities to the Mayor of London and of looking at the franchising process for relevant lines, if the right governance arrangements could be put in place. These discussions have stalled over the past two years, but London Councils officers will

continue to explore ways in which relevant rail franchise decisions can be influenced in an effective way.

17. Funds available to London boroughs for highways maintenance continues to fall significantly short of what is needed. The accumulated highways maintenance backlog in London is currently estimated to be approximately £907 million¹. As a result, London boroughs are forced to sacrifice funding from other vital services such as adult social care, child protection and care services to ensure that highways continue to be maintained to a good standard.
18. In late 2018, the Government announced an additional £420 million fund for local authority highway maintenance in 2018/19 but this was initially planned to exclude London authorities. Effective lobbying by London Councils, borough and TfL officers led to the allocation of £20 million of this fund for London authorities.
19. London Councils' officers continue to lobby with TfL, the Mayor, businesses and London MPS to devolve Vehicle Excise Duty (VED) back to the Capital. 90 per cent of Londoners' journeys are undertaken within London and the estimated £500m of VED paid by Londoners each year would almost cover annual expenditure on highway maintenance (although not deal with the backlog).

Next Steps

20. London Councils officers and TEC will continue to work on supporting the implementation of the pledges as outlined in this report and will keep Leaders updated on a regular basis.

Recommendations: Leaders' Committee is asked to note and comment on this report

Financial implications for London Councils

None

Legal implications for London Councils

None

Equalities implications for London Councils

None

¹ State of the City report. Available here: <https://www.londoncouncils.gov.uk/node/34627>

Leaders' Committee

London Blueprint on Female Offenders Item No 7

Report by: Doug Flight **Job title:** Head of Strategic Policy

Date: 4 June 2019

Contact Officer: Catherine Dunn

Telephone: 020 7934 9909 **Email:** catherine.dunn@londoncouncils.gov.uk

Summary:

This report gives an overview of London's Blueprint for whole system approach to women in contact with the Criminal Justice System.

The Blueprint sets out a common ambition for London partners to work together to improve outcomes for female offenders and is intended to create a foundation for a whole systems approach, focused on diversion and early intervention.

This work has been led by the Mayor's Office of Policing and Crime (MOPAC) in partnership with the Prison Reform Trust, with input throughout its development from key stakeholders including boroughs.

The Blueprint forms part of the delivery of shared commitments in the Memorandum of Understanding on Criminal Justice Devolution.

Recommendations:

Leaders' Committee is asked to:

- a. Endorse the shared vision outlined in the Blueprint to develop a whole systems approach to female offenders in London.
 - b. Commend the Blueprint to individual London local authorities, who are invited add their formal support as signatories.
-

London Blueprint on Female Offenders

Background

1. Women who end up in contact with the criminal justice system as offenders tend to be highly vulnerable, often with complex, intersecting needs and experiences of abuse and trauma. 60% of women in prison have reported experiences of domestic abuse; 49% reported previous suicidality. Maternal imprisonment can also have a significant impact on children, including longer term intergenerational effects.
2. The nature of women's offending tends to differ from the wider male offender cohort:
 - Women are usually convicted for non-violent offences and tend to present a lower risk; 36% of custodial sentences for women in 2016-17 were for shoplifting offences¹.
 - Women tend to receive shorter custodial sentences compared to men – 72% receiving sentences of 6 months or less, compared to 56% of male offenders²³
3. Women account for a minority of the entire offender cohort, representing 21 per cent of community caseloads in London and just 4 per cent of the custodial estate. As a result, the needs and experiences of women are often neglected within the Criminal Justice System.
4. The National Female Offender Strategy was published by the Ministry of Justice in July 2018. It sets out the case for local areas to develop a specific approach to women offenders based on the principles of a whole systems approach. This approach is focused on diverting women from prison towards community-based interventions and centres on wrap-around support through a network of women's centres.
5. Greater Manchester and Wales have worked to implement a whole systems approach based on these principles. A Greater Manchester pilot has offered early

¹ [Criminal Justice System statistics quarterly: December 2017, Ministry of Justice 2017](#)

² ["A Whole Systems Approach to Female Offenders: Emerging Evidence" Ministry of Justice 2018](#)

³³ [Supporting data tables: Female Offender Strategy, Ministry of Justice 2018](#)

promising evidence of an impact on imprisonment rates since 2014/15, including a 40% reduction in number of women sentenced to immediate custody⁴.

6. In March 2018, London Councils, the Ministry of Justice and the Mayor of London signed a Memorandum of Understanding on Criminal Justice Devolution. This included a commitment to developing a new approach to managing female offenders in London with a focus on directing interventions and investment upstream. Work is continuing with the Ministry of Justice to identify opportunities for fiscal devolution to London to support sustainability of provision, including jointly commissioned research⁵.
7. This programme of work has been reported to the London Crime Reduction Board in the course of its development. London Councils is represented on the Board by its Chair, Cllr Peter John; Cllr Jas Athwal, Executive Lead for Crime and Public Protection; Cllr Nickie Aiken, Conservative Shadow Lead for Crime and Public Protection and Cllr Liz Jaeger, Liberal Democrat Shadow Lead for Crime and Public Protection.

Developing a Whole Systems Approach for London

8. The Whole Systems Approach centres on directing women to support in the community, delivered through specialist women's centres, with the aim of addressing underlying drivers of offending. There is a focus on prevention and early intervention with the goal of diverting women away from prison and reducing reoffending⁶. Effective multi-agency approaches and partnership-working can support positive outcomes from these community-based interventions.
9. This approach is designed to bring key agencies together to align their work and coordinate more effectively to improve outcomes for some of the most complex and vulnerable women in society. Many will be trapped in patterns of reoffending, often driven by alcohol and substance use needs, by the offending of a partner or other aspects of disadvantage:

⁴

⁵ [Working Towards Justice Devolution for London: Memorandum of Understanding, March 2018](#)

⁶ ⁶ ["A Whole Systems Approach to Female Offenders: Emerging Evidence" Ministry of Justice 2018](#)

- 48% of women reported they committed their offence to support someone else's drug use; 39% needed help supporting a drug problem on entering prison.⁷
- Research found that 65% of women at a UK prison showed signs of traumatic brain injury; the majority reported that this was sustained through domestic abuse.⁸

10. Women at risk of contact with the Criminal Justice System will often be involved with multiple local services – such as housing, social care, drug and alcohol services and mental health provision. Developing a whole systems approach would enable best use of existing resources to meet these needs and manage demand on local services. Local authorities would have an important role in shaping and delivering this, in partnership with other agencies, such as National Probation Service (NPS) and London Community Rehabilitation Company (CRC).

London Blueprint for a Whole Systems Approach

11. The London Blueprint is a vision statement, which partners are invited to support, setting out a shared ambition to reduce the number of women going to prison in London year on year and to improve outcomes for female offenders. It is intended to offer a strategic framework for London partners to work together towards these core aims, bringing together existing policies and strategies.
12. The Blueprint was developed by an interagency sub-group of the London Crime Reduction Board. This included representatives from London Councils and local authority community safety leads, as well as the MPS, London CRC, National Probation Service and NHS. Borough officers were engaged in the development of the Blueprint through a consultation event in November 2018 and drafts of the Blueprint have been circulated to relevant borough officer networks.

⁷ ["Why focus on reducing women's imprisonment: a factsheet", Prison Reform Trust 2019](#)

⁸ ["Making the Link: Female Offenders and Brain Injury", The Disabilities Trust 2019](#)

13. An Action Plan will be developed in the six months following the launch of the Blueprint. This will set out a work plan for delivering on shared commitments and areas for future work to develop a whole systems approach on an operational level.

14. Local authorities will be engaged as key partners in shaping the detail and delivery of this Action Plan. It will be developed through a new sub-group of the London Crime Reduction Board which will include representation from borough officer networks for community safety and housing as well as London Councils.

15. There are key areas where the Blueprint could make a difference on a local level. These include:

- **Resettlement and accommodation:** many women are still released from prison to insecure and short-term accommodation, often at risk of homelessness.
- **Young women in the Criminal Justice System:** young women over 18⁹ can be at risk of falling through the gaps in transition between youth and adult systems and could benefit from a more tailored and gender-specific approach.
- **Impact on children:** Fewer women in prison can reduce the number of children going into care and the associated impacts from maternal imprisonment and involvement with the Criminal Justice System.

16. The Blueprint Statement (**Appendix A**) itself sets out a high-level vision and shared commitments which key partners are invited to support. These include commitments to close joint working between agencies; establishing best practice in meeting underlying legal obligations as well as working together to support and sustain investment in community-based solutions to women's offending.

17. The Statement is accompanied by an Annex (**Appendix B**), which contains more detailed context and specific areas for future work by agencies. This includes:

- Accommodation and resettlement
- Young women and care leavers
- Drug and alcohol needs

⁹ The Blueprint refers only to offenders over 18 but acknowledges overlapping needs vulnerabilities between youth and adult offender cohorts, as outlined in the Annex (Appendix B)

- Mental health needs
- Domestic and sexual abuse

18. Recent investment in specialist women's centres in London has come through co-commissioning by MOPAC and CRC and was further expanded through London Crime Prevention Fund co-commissioning with local authority support. As a result, 21 boroughs now have enhanced wrap-around support in the community for female offenders in place until 2021. A MOPAC-commissioned Liaison and Diversion project with the MPS is also due to begin delivery across pilot boroughs. The Blueprint seeks to build on these interventions and investments.

19. There is a recognition in the Blueprint that agencies face significant resourcing pressures and are operating in a challenging financial context. A whole systems approach aims to make best use of existing resources by aligning work to deliver better outcomes in the long term and secure added value from current investment.

20. Opportunities to secure investment to support the sustainability of provision will be explored, including making the case to Ministry of Justice for increasing resources to London. This, for example, could include the potential for fiscal devolution, a pilot site for a residential women's centre as well as other opportunities for investment. Jointly commissioned research by MOPAC and Ministry of Justice is underway to identify current spend in London and resources required to support a Whole Systems Approach.

Conclusion

21. An advanced draft of the Blueprint was presented to the London Crime Reduction Board meeting on 9th April 2019, where it was welcomed by partners. London Councils' Members on the Board suggested that the Blueprint be taken to Leaders' Committee for consideration. Subsequently, individual London boroughs will be invited to consider signing up to the Blueprint to demonstrate their commitment to this strategic approach - alongside other key stakeholders.

22. We understand that the Deputy Mayor for Policing and Crime will shortly consider giving her formal approval to the Blueprint and is minded to write to Leaders, to

encourage individual boroughs to sign up to the document and hence to endorse the vision for a whole systems approach to women in London's Criminal Justice System.

23. Leaders' Committee is asked to consider giving their endorsement to the Blueprint and its core aims. Leaders are asked to:

- a. Endorse the shared vision outlined in the Blueprint for a whole systems approach to female offenders in London:
- b. Commend the Blueprint to individual London local authorities, who will be invited to add their formal support as a signatories.

Financial implications for London Councils:

None

Legal implications for London Councils:

None

Equalities implications for London Councils:

The Blueprint seeks to address equality issues by identifying and responding to the needs of women with protected characteristics who are in contact with the Criminal Justice System, including BAME, LGBT women and offenders with insecure immigration status. It also acknowledges the distinct needs of women as an offender cohort.

Attachments:

Appendix A: London Blueprint

Appendix B: London Blueprint Annex

Annex A

London's Blueprint for a Whole System Approach to Women in Contact with the Criminal Justice System

2019 - 2022

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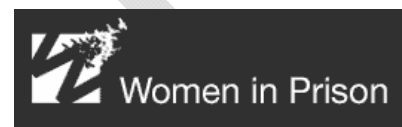
Acknowledgements

This Blueprint has only been possible thanks to the support of the stakeholders who have helped co-develop it. We would like to thank them for their help.



MAYOR OF LONDON

OFFICE FOR POLICING AND CRIME



Signatories

The following organisations are signatories to this Blueprint.

Organisation	Signatory	Signature
Mayor's Office for Policing and Crime	Sophie Linden, Deputy Mayor of London	<i>[insert signature]</i>

About the Blueprint

London's Blueprint for implementing a whole system approach to women in contact with the criminal justice system and at risk of such contact (hereafter referred to as 'women') was developed through a consultative process and is intended to consolidate the range of strategies and commitments in respect of women in London and set a foundation for ongoing multi-agency work in this area. The Blueprint is intended to:

- Articulate the signatories' shared vision and aims and all partners' roles and responsibilities.
- Map existing provision for women in London and highlight the gaps.
- Create a foundation for the development of an Action Plan for working towards a sustainable whole system approach, including markers for measuring progress and ensuring shared responsibility and accountability.
- Explain the context and underlying evidence in support of the whole system approach and what this should mean for women in London.
- Provide for the coordination and long-term sustainability of services, laying a foundation for a broader investment base and effective co-commissioning, and supporting the coordinated allocation of scarce resources across agencies to provide the best possible outcomes.
- Support progress towards achieving the devolution commitments agreed by the Ministry of Justice, Mayor's Office on Police and Crime (MOPAC) and London Councils.
- Achieve stronger connections with national and local strategies to tackle violence against women and girls.
- Improved consideration of the impact on children whose mothers are in contact with the criminal justice system or at risk of such contact.
- Offer a starting point for ongoing conversation between all partners and provide a useful source of reference for all those working with women in London.

The Blueprint consists of a Statement of Shared Commitments and an accompanying Annex. The Statement of Shared Commitments has been formally adopted by all partners listed at the end of the Annex ('the Signatories') and articulates the vision and aims of the Signatories. The Annex provides background context for the Blueprint including a case study illustrating many of the needs the Signatories seek to meet, and information about current provision in London. Section 5 of the Annex draws on the evidence base and feedback provided by a range of agencies through the Blueprint consultation to help inform MOPAC's development of an Action Plan and to provide a starting point for discussion and joint work by the Blueprint Delivery Group in implementing a whole system approach.

Statement of Shared Commitments

Signatories' Opening Statement

1. The Signatories to this Statement of Shared Commitments agree that:
 - a. All women in London who are in contact with the criminal justice system or at risk of such contact (hereafter referred to as 'women') are entitled to receive a holistic, trauma informed, woman-centred approach throughout the criminal justice process and in the delivery of early prevention and intervention services. This includes women suspected or convicted of serious offences, as well as the majority of women who are prosecuted for suspected minor, non-violent offences.
 - b. As stated in the government's Female Offender Strategy published in June 2018, there are a number of common underlying factors linked to women's offending, including domestic abuse, sexual abuse and coercion, human trafficking, modern slavery and exploitation, involvement in prostitution, poverty, homelessness, intersectional discrimination, mental health needs, learning disabilities, problematic substance use, and a lack of education and skills training.¹
 - c. Most of the solutions to women's offending lie in the community, including through early intervention and prevention, diversion at the point of arrest and community sentencing options where available, rather than short custodial sentences for minor offences.
 - d. We are committed to working together to transform the criminal justice response to women in London, improve outcomes and reduce women's imprisonment by developing and implementing an evidence-based, sustainable whole system approach. This includes a commitment to systemic change.

Commitment to close joint working

2. The Signatories agree that achieving better outcomes for vulnerable women requires close joint work between criminal justice agencies, health and social care agencies and voluntary sector services. There may also be opportunity for work with the women themselves. The Signatories acknowledge and respect each other's distinct legal duties, professional responsibilities, objectives and cultures. No single agency has the ability to achieve the Signatories' ambitions on its own and some agencies will have more influence over some areas than others. Success relies on collaborative work towards shared goals. All Signatories have a key role to play through performance of their statutory functions and in commissioning or delivering services for women. The Signatories agree to work together to ensure they fulfil their

¹ Ministry of Justice (2018) Female Offender Strategy, London: MoJ

responsibilities in a strategic and coordinated way which supports their shared aims, noting the following:

- a. Local authorities are uniquely placed to work strategically with local stakeholders to ensure the needs of women in their local area are identified and met, and they perform a central role both in commissioning and providing services and in coordinating provision locally.
- b. The Mayor's Office on Police and Crime (MOPAC) has a key leadership and commissioning role and is uniquely positioned to support criminal justice agencies, health and social care agencies and local authorities in developing a London-wide approach. The close working between local authorities and MOPAC through the co-commissioning model has been instrumental in supporting closer collaborative working across a number of local authorities to support women in the criminal justice system. The Signatories aim to build on this in future working arrangements, strengthening working relationships with housing providers, health and social care agencies and the judiciary amongst other partners.
- c. The Metropolitan Police Service's support for women in the criminal justice system is key to improving outcomes for women and their families, including diversion where appropriate.
- d. The Crown Prosecution Service performs a key function in making the appropriate prosecution of all suspects and defendants including women, pursuant to the Code for Crown Prosecutors.
- e. HM Courts and Tribunals Service (HMCTS) provides oversight to the criminal courts processing women in London.
- f. HM Prisons and Probation Service (HMPPS) manages public prisons and the contracts for private prisons. Most women from London are imprisoned in HMPs Send and Downview, which are publicly owned, and HMP & YOI Bronzefield, which is privately run. HMPPS delivers probation services via the National Probation Service (NPS) and oversees delivery by the London Community Rehabilitation Company (London CRC).
- g. Through their statutory functions, the NPS and London CRC perform an essential role in managing women through the criminal justice process, including the NPS' role in preparing pre-sentence reports to support sentencing. London CRC also has an important commissioning function.
- h. NHS England, Public Health England and Clinical Commissioning Groups all have key functions to play in the provision and commissioning of high-quality services for women in contact with the criminal justice system and at risk of such contact.

- i. Voluntary and community sector agencies provide essential and specialist gender specific services to support women.

Underlying legal obligations

Equal treatment

3. Pursuant to our obligations under the Equality Act 2010 and the findings of the Lammy review², the Signatories are committed to achieving equal treatment of all women, including:
 - a. Black, Asian and minority ethnic women;
 - b. Foreign national women;
 - c. Women with disabilities;
 - d. Gypsy, Roma, and Traveller women;
 - e. Women of different faiths; and
 - f. LGBT women.

We will scrutinise outcomes for women in these minority groups and, where disparities appear with no justifiable explanation, we will implement reforms in consultation with women and specialist service providers. MOPAC will prepare an equality impact assessment at an early stage and this will inform the regular review of the Blueprint.

Non-prosecution of victims of human trafficking and modern slavery

4. The Signatories are committed to ensuring the non-prosecution of victims of trafficking in line with the law, by establishing better systems for the early identification of women who are potential victims and ensuring decisions on whether to prosecute are well informed.

Best interests of children

5. The Signatories are committed to fulfilling their legal obligations to protect the best interests of children whose mothers are in contact with the criminal justice system. We will work towards achieving the following:
 - a. Separation by imprisonment is avoided wherever possible;
 - b. Imprisonment of pregnant women is avoided wherever possible;
 - c. Where imprisonment cannot be avoided, support is provided to both children and mothers in order to limit the negative effects of separation. This could include services being commissioned to facilitate regular telephone and face

² Ministry of Justice (2017) The Lammy Review: An independent review into the treatment of, and outcomes for, Black, Asian and Minority Ethnic individuals in the Criminal Justice System, London: MoJ

to face contact with children where appropriate; and best practice is followed in the treatment of pregnant women and new mothers including ante-natal care, birth and post-natal care;

- d. Proper account is taken of women's parenting responsibilities and measures implemented to help ensure these do not operate as a barrier to their compliance with criminal justice proceedings, including meeting the requirements of out of court disposals, community sentences and licence and supervision requirements. This will take into account safeguarding law and best practice and that the best interests of the child may not always align with the mother's wishes; and
- e. Parenting support is provided where it is needed, including offering support dedicated to the mother in addition to the child's social worker.

Homelessness Reduction

- 6. We will work towards establishing a shared approach across London, working closely with local authority housing departments and London Councils, to address the housing needs of women in contact with the criminal justice system, including preventing homelessness and resettlement on release. This will include:
 - a. Working together to intervene earlier and more effectively to prevent women being made homeless, in line with the Homelessness Reduction Act 2017 and Code of Guidance;
 - b. Aiming to ensure that all women are resettled into safe and suitable accommodation, either long term or including a realistic plan for achieving long term accommodation; and
 - c. Aiming to ensure that all women have access to tailored wrap around support to meet their emotional, health and practical needs upon resettlement

Building on existing provision

- 7. The main building blocks for developing a whole system approach in London are:
 - a. The South London Alliance and Advance Minerva co-commissioned projects to deliver a whole system approach for women up to March 2021 across a total of 21 London boroughs;
 - b. Advance Minerva provision funded by London CRC up to 2020 across 21 London boroughs;
 - c. London CRC's women's strategy, including women specific training and the development of women's hubs in the seven boroughs not covered by the South London Alliance or Advance Minerva;

- d. The Metropolitan Police Service's female offender diversion pilot, due to be launched across two basic command units in 2019 until March 2021;
- e. A focus on reducing the number of women in custody by the NPS in London by taking a gender and trauma informed approach to sentencing and through breach and recall proceedings. Trauma informed training to be available to NPS staff in 2019;
- f. Liaison and Diversion services operating across the whole of London to identify women who have needs relating to mental health, learning disability, substance misuse or other vulnerabilities when they first come into contact with the criminal justice system, to support them into appropriate health or other services (where available into women specific services);
- g. A range of women specific provision commissioned by local authorities across London; and
- h. A range of women specific provision provided by voluntary and community services with charitable funding.

We will work together to ensure the success, sustainability and evidence-based development and expansion of the provision outlined above, sharing expertise and data where appropriate.

Aims to be achieved by 2022

- 8. Over the next three years the Signatories will work together to reduce the number of women from London received into prison year on year, particularly those remanded or serving short sentences. In order to achieve this, the Signatories aim to ensure there is sustained investment in community solutions to women's offending including early intervention and prevention, the effective use of police diversion and triage, robust community sentencing options for those on the cusp of custody (including but not limited to the development of a women specific Community Sentence Treatment Requirement) and through the gate support, all aimed at addressing the root causes of offending by women.
- 9. The Signatories recognise the need to ensure there is direct engagement with judges, magistrates and court staff about the impact on women of short custodial sentences and the availability of community services to support compliance with community orders. This should build on existing opportunities offered by probation liaison groups and the co-commissioned services and should include awareness raising about the effectiveness of voluntary, consent-based approaches to the delivery of women's services.
- 10. We will work together to try and mitigate the challenges arising from the fact that there is no women's prison in London, following the closure of HMP Holloway.

11. We will work with the Ministry of Justice where possible to support its fulfilment of its obligation to establish suitable, women specific Approved Premises in London.³
12. We will identify and pursue where possible any opportunities for women in London arising from the government's proposed pilot residential facilities and from the proposed expansion of the Community Sentence Treatment Requirement.⁴
13. We will strive to sustain and improve engagement and retention of women with community-based services through early intervention and prevention work and at all stages of the criminal justice process.
14. The Signatories are committed to working together to explore opportunities for improving outcomes and making the best use of scarce resources through the establishment of regional, specific courts in London where expertise and specialist support can be concentrated and where a problem-solving approach can be adopted.

Sufficient, sustainable investment

15. We will strive to achieve sufficient, sustainable investment in women specific community services to achieve our aims. This will include:
 - a. Establishing what resources are required to achieve our aims and what funding sources may be accessed, whether 'in kind' or through the use of pooled / aligned budgets, to develop a business case for additional financial investment;
 - b. Services across local authorities, health bodies and criminal justice agencies coordinating effectively with each other and with the voluntary and community sector on a local and regional level to make best use of existing resources in the community and building in a tailored approach to current provision;
 - c. Working collaboratively to align our priorities and budgets and pool resources wherever possible;
 - d. Developing and implementing a sustainability strategy for investment in a network of women's centres within London to operate as hubs for community-based provision as part of developing a whole system approach; and
 - e. Exploring whether future funding arrangements can provide a better link between upfront spending and savings from investment.

³ R (Coll) v Secretary of State for Justice [2017] UKSC 40

⁴ Ministry of Justice (2018) Female Offender Strategy, London: MoJ

Data sharing

16. Within six months of the launch of the Blueprint, the Signatories will agree a basic data set to be prepared by MOPAC and reviewed regularly by the Signatories in order to establish base lines, monitor progress and drive improvements.

Women with lived experience of the criminal justice system

17. Signatories will agree a process, to be coordinated by MOPAC, for women with lived experience of the criminal justice system to be consulted about the Action Plan and annual Blueprint reviews and for their views and insights to be taken into account.

Governance and Action Plan

18. A Blueprint Delivery Group will be established in which all Signatories will be represented, meeting quarterly to review progress. The Group's terms of reference will be established within three months of the launch of the Blueprint and will be reviewed annually. The Group will be chaired by MOPAC's Director of Criminal Justice and Commissioning and will be serviced by MOPAC with respect to arranging meetings (invites, venues etc.) and taking and distributing minutes of meetings. The Group will review the terms of the Blueprint annually to ensure it remains relevant and reflects the shared aims of the signatories, and the Blueprint will be fully refreshed in 2022.
19. The Blueprint Delivery Group will report to the Reducing Reoffending Board which in turn reports to the Delivery Management Group, chaired by the Deputy Mayor for Policing and Crime, and the London Crime Reduction Board, chaired by the Mayor of London. Each of these Boards will have as a standing item the delivery of the whole system approach to women in London.
20. MOPAC will coordinate preparation of an Action Plan for delivery of the Blueprint, in consultation with the Blueprint Delivery Group, to be finalised within six months of launching the Blueprint.

London's Blueprint for a Whole System Approach to Women in Contact with the Criminal Justice System - ANNEX

2019 - 2022

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1. Introduction

Vision and aims

The Signatories to the Statement of Shared Commitments are committed to improving outcomes for women in London who are in contact with the criminal justice system or at risk of such contact (hereafter referred to as 'women'), using a consistent, evidence-based and gender-informed approach. To this end, the Signatories have made a commitment to work together to develop and implement a sustainable whole system approach for the treatment of these women. The over-arching aims are to:

- Reduce the number of women in prison, particularly on remand and on short custodial sentences
- Improve access to support services for women in prison
- Ensure there is sufficient funding and investment in community services for women in contact with the criminal justice system or at risk of such contact
- Increase and improve opportunities for early intervention and diversion.

Women in the criminal justice system in England and Wales – key facts

- The UK has one of the highest rates of women's imprisonment in Western Europe.
- The women's prison population in England and Wales more than doubled since 1995 - from under 2,000 women to nearly 4,000. 8,474 women were sent to prison in England and Wales in 2017.¹
- As is recognised in the government's Female Offender Strategy, although the proportion of women in the criminal justice system is small – approximately 5% of the prison population and 15% of offenders in the community – the positive impact of addressing their needs is significant².
- Women in prison in the UK have often been victims of much more serious offences than the ones they are accused of committing. More than half (53%) report having experienced emotional, physical or sexual abuse as a child compared to 27% of men³. 57% of women report having been victims of domestic violence as adults. Because many women fear disclosing abuse, both figures are likely to be an underestimate⁴.
- There can be strong links between women's offending behaviour and their experience of domestic (physical and emotional) abuse, coercive control and sexual abuse. Women who are subjected to domestic abuse may be coerced into offending by their abuser⁵. Women can become trapped in a vicious cycle of victimisation and

¹ Ministry of Justice (2018) Prison receptions 2017, London: MoJ

² Ministry of Justice (2018) Female Offender Strategy, London: MoJ

³ Ministry of Justice (2012) Prisoners' childhood and family backgrounds, London: MoJ

⁴ Gelsthorpe, L., Sharpe, G., and Roberts, J. (2007) Provision for Women offenders in the community London: Fawcett Society

⁵ [Prison Reform Trust \(2017\) "There's a reason we're in trouble": Domestic abuse as a driver to women's offending, London: PRT](#)

criminal activity. Their situation is often worsened by poverty, substance dependency or poor mental health living with them before custody⁶.

- Women in prison are far more likely than men to be primary carers of children. A Ministry of Justice survey found that 58% of women compared with 43% of men in prison had dependent children⁷.
- Women are more likely than men to be sent to prison for a first-time offence; in 2018 22% of women in prison had no previous convictions or cautions compared to 14% of men⁸. Women's offences are more likely than men's to be prompted by their relationships with 48% of women, compared to only 22% of men, saying that they had committed offences to support someone else's drug use⁹.
- In 2017 TV licence evasion accounted for 30% of all prosecutions for women, but only 4% for men. 72% of the 136,550 defendants prosecuted for TV license evasion in that year were women¹⁰.
- There is a widely recognised, continuing failure to avoid prosecuting and imprisoning women who are victims of trafficking, as highlighted in a recent report published by PRT in partnership with Hibiscus Initiatives¹¹.

Legal framework for a gendered approach

Treating women and men equally does not mean that everyone should be treated the same. Where the circumstances and needs of women and men are different, distinct approaches may be required to achieve equitable outcomes and the Equality Act 2010 allows women only or women-specific services. The public sector equality duty requires public services, including those delivered by the private and voluntary sector, to assess and meet the different needs of women and men. Section 10 of the Offender Rehabilitation Act 2014 amended the Offender Management Act 2007, placing a duty on the Secretary of State for Justice to ensure that arrangements for supervision or rehabilitation identify specific need and so make appropriate provision for women.

National female offender strategy and other relevant reports

The Ministry of Justice published a national Female Offender Strategy in June 2018 which lays out the case for taking a gender specific approach to women who offend or are at risk of offending and for using community solutions to tackle minor offending by women.¹² The strategy makes detailed commitments to improve the treatment of women in contact with the criminal justice system, including developing a National Concordat on Women Offenders. The strategy was published alongside new police guidance on working with vulnerable

⁶ Janet Loveless (2010) Domestic Violence, Coercion and Duress, Criminal Law Review, pp. 1-3

⁷ Referenced in Ministry of Justice (2012) Prisoners' childhood and family backgrounds, London: MoJ.

⁸ Table A1.19 Annual Prison Population 2018, Ministry of Justice (2018) Offender management statistics quarterly: January to March 2018 London: MoJ

⁹ Light, M., Grant, E. and Hopkins, K. (2013) Gender differences in substance misuse and mental health amongst prisoners, London: MOJ

¹⁰ Ministry of Justice (2018) Statistics on Women in the Criminal Justice System 2017, London: Ministry of Justice

¹¹ [Prison Reform Trust \(2018\) Still No Way Out, London: PRT \(summary report\)](#) and full report [here](#).

¹² Ministry of Justice (2018) Female Offender Strategy, London: MoJ

women¹³ and is set in the context of the government's commitment to developing an evidence-based whole system approach for women offenders¹⁴.

The Blueprint is intended to support delivery of the ambitions of the Female Offender Strategy in London, together with the following strategies as they relate to women in contact with the criminal justice system:

- The Memorandum of Understanding 'Working towards justice devolution', agreed by the Mayor's Office for Police and Crime (MOPAC), the Ministry of Justice and London Councils in March 2018¹⁵
- The London Tackling Violence Against Women and Girls Strategy 2018-2021¹⁶
- The London Female Offender Health Strategy
- The cross-government Victims Strategy¹⁷
- The cross-government strategy to end violence against women and girls 2016-2020¹⁸
- The government's response to the consultation 'Transforming the Response to Domestic Abuse' and draft Domestic Abuse Bill¹⁹
- The Lammy review of the treatment of, and outcomes for, Black, Asian and Minority Ethnic individuals in the criminal justice system and the government's response and 2018 update²⁰

A number of other policy documents, reports and evaluations have relevance to the work which is the subject of the Blueprint, including the inquiry of the London Assembly's Police and Crime Committee into London's response to women in the criminal justice system²¹ and the evaluation of the whole system approach for women offenders in Greater Manchester²².

Shared ambition for a whole system approach in London

London is positioned to become a national leader in responding to women in contact with the criminal justice system, improving outcomes for families and the wider community in the capital. In 2018 MOPAC announced major investment in services for women in contact with the criminal justice system and a large-scale Metropolitan Police Service (MPS) women's diversion pilot. This builds on a range of existing women's services commissioned or provided by local authorities, voluntary and community sector organisations, NHS England, Public Health England, the National Probation Service and London CRC. There is a shared ambition amongst all partners to work towards a whole system approach for women offenders and to achieve a permanent strategic change in the way women at risk of imprisonment in London are helped.

¹³ Ministry of Justice (2018) Managing Vulnerability: Women – Fact pack, London: MoJ

¹⁴ Ministry of Justice (2018) A Whole System Approach for Female Offenders – Emerging evidence, London: MoJ

¹⁵ MOPAC, Ministry of Justice, London Councils (2018) Working towards justice devolution to London: Memorandum of understanding between the Mayor's Office for Policing and Crime, the Ministry of Justice and London Councils, London: MoJ, MOPAC, London Councils

¹⁶ Greater London Authority (2018) A Safer City for Women and Girls: the London Tackling Violence against Women and Girls Strategy 2018-2021, London: GLA

¹⁷ HM Government (2018) Victims Strategy, London: HM Government

¹⁸ HM Government (2016) Ending violence against women and girls: Strategy 2016-2020, London: HM Government

¹⁹ HM Government (2018) Transforming the Response to Domestic Abuse: Government consultation, London: HM Government – see the government's response and the draft Domestic Abuse Bill here:

<https://www.gov.uk/government/consultations/domestic-abuse-bill-consultation>

²⁰ Ministry of Justice (2017) The Lammy Review: An independent review into the treatment of, and outcomes for, Black, Asian and Minority Ethnic individuals in the Criminal Justice System, London: MoJ

²¹ London Assembly (2018) A long way from home: Improving London's response to women in the criminal justice system, London: London Assembly

²² Kinsella, R. et al (2018) Whole System Approach for Women Offenders Final Evaluation Report, Manchester: Policy Evaluation & Research Unit, Manchester Metropolitan University

What is a whole system approach?

A whole system approach for women in contact with the criminal justice system, and those at risk of such contact, is a multi-agency approach which seeks to address the complex needs these women often have. This is done by bringing local agencies together to provide joined-up, holistic and gender responsive support which recognises and responds to women's distinct needs, including experience of abuse. A whole system approach should divert women away from the criminal justice system where appropriate and reduce reoffending and demand on services²³.

Implementing a whole system approach to women in contact with the criminal justice system in London involves different justice agencies (and other public services) aligning to invest in prevention and community-based alternatives where these offer better outcomes to the use of costly incarceration of women who present a low risk of harm.

Justice devolution in London

MOPAC, the Ministry of Justice and London Councils have expressed their shared commitments to developing a whole system approach for women in London in their Memorandum of Understanding published in March 2018 which is due to be updated in March 2019.²⁴ As first steps towards this they have committed to:

- Working collaboratively to align their priorities and budgets;
- Sharing data where appropriate;
- Investing in prevention and community-based alternatives to the imprisonment of women who present a low risk of harm;
- Establishing greater use of police diversion and triage;
- Co-designing and implementing credible alternatives to custody, which address the root causes of offending by women;
- Exploring the scope for implementing a pan-London approach to the resettlement of women from prison;
- Exploring future investment in a network of women's centres within London to operate as hubs for community-based provision, as a step towards the fulfilment of a whole system approach; and
- Exploring whether future funding arrangements can provide a better link between upfront spending and savings from investment.

Purpose of the Blueprint

The Blueprint was developed through a consultative process and is intended to consolidate the range of strategies and commitments in respect of women in London and set a foundation for ongoing multi-agency work in this area.

²³ Ministry of Justice (2018) A Whole System Approach for Female Offenders: Emerging evidence, London: MoJ

²⁴ MOPAC, Ministry of Justice, London Councils (2018) Working towards justice devolution to London: Memorandum of understanding between the Mayor's Office for Policing and Crime, the Ministry of Justice and London Councils, London: MoJ, MOPAC, London Councils

2. Case study: Aisha's story

Aisha's story illustrates many of the areas of need which London's whole system approach must address in order to improve outcomes for women in London and their families, as well as showing how specialist services in the community can enable women in the most difficult circumstances to get the support they need and gain opportunities to fulfil their potential. The case study was created by Advance using a changed name and an amalgamation of Advance's Minerva Service service-users' testimonies in order to preserve anonymity:

I started shoplifting when I was 17. Before I started shoplifting, I would hang around shops and not buy anything, just because I was lonely. But then I wanted to get caught in order to feel something, I didn't want to feel numb anymore.

Growing up, I had a very difficult relationship with my mother and I moved out of home when I was 15. My stepdad was a violent alcoholic and my brother had severe bipolar disorder and it all became too much. I was sexually assaulted shortly after and I was then moved into emergency accommodation in a new borough, which I hated.

I got involved with a gang in this new borough and that made me feel less lonely. It started off with doing a few favours and lifts for people however progressed to dealing drugs. Worst part was everything in between: seeing people get shot, stabbed, acid attacks, being made to do things to others with the threat that it would happen to me if I didn't do it, having to carry weapons, being publicly beaten in front of the gang if I 'stepped out of line'.

I was involved in a relationship with a member of the gang. It was an abusive relationship and I was conditioned and controlled in all aspects of life - money, accommodation, where I went and who with. My keyworker says she always remembers me walking behind her as I wasn't used to walking next to people.

I was caring for my children under a Supervision Order because social services were aware that I was drinking heavily. One day, I got very drunk and my children were taken away from me and placed into foster care. The worst outcome for me through all of this was that I haven't seen my children; however, I am glad they didn't have to be there when I wasn't in a good place.

It was very difficult for me to speak to social services and convince them to let me have contact with my children. In fact, I found it difficult to engage with any agencies because I felt I was shaming the Muslim community and services had always let me down in the past. When I first started seeing my Minerva worker, I only told her what I thought she wanted to hear and didn't really think she could help me.

But my keyworker was extremely persistent and I started to believe that she really had my best interests at heart. She did not judge me and she understood where I was coming from. My keyworker advocated for me in lots of ways. She supported me with finding a new home and filling in the housing application. At first, I wasn't happy to be moving to a 1 bedroom flat, because I was used to bigger places with my children, but once she explained it to me I saw the advantages of being somewhere new that was much safer. She was able to get my social worker to hear my side of the story and I now have supervised contact with my children.

My keyworker helped me to get a mental health diagnosis and encouraged me to register for counselling, so I am now on medication and in therapy for my depression. She motivated me to attend one of Advance's groups for trauma and domestic abuse. She accompanied me to the first session, because I was nervous, and I found the sessions really helpful. Through the

group, I realised that I was sexually abused as a child, and I am working through this with my counsellor.

My keyworker challenged my drinking by getting me to do “what if” scenarios and weighing up the pros and cons. She made me see I needed to sort out my drinking if I was going to get better and helped me to register with a specialist group.

I started feeling quite bored and like I needed a purpose. She helped me to enrol into a course that we found and I started a college health and safety Level 2 course. When the course started, I didn't go regularly because I thought the campus was quite far but she showed me how to get there easily on public transport. I was struggling with the coursework and doing assignments on the computer, but she supported me with getting computer classes, which have helped. My keyworker is hoping to get me on motivational career groups for ethnic minority women, which I'm looking forward to because I plan on keeping up my motivation to turn my life around.

3. Current provision in London

The map at Fig. 1 and the table at Fig. 2 on pages 13 and 14 below show the boroughs in which women specific services have been commissioned by either London CRC or MOPAC and the seven boroughs without any contracted women specific services. These seven boroughs are a priority for London CRC in developing partnerships with other external specialist services, exploring potential hub opportunities and piloting women-specific interventions.

Advance's Minerva (AM) CRC service

This project, led by Advance's Minerva programme, is contracted by London CRC to deliver one-to-one support to sentenced women across 21 London boroughs up to March 2020. Operating with referrals from the CRC and NPS via the rate card, the service includes ten key workers working with up to 50 women each, with an expectation of 950 referrals each year. Women receiving this service are expected to have 'standard practical needs' and will see their key worker once a month for up to a year following the initial engagement. Advance's Minerva CRC Service provides an additional through the gate service via a weekly drop in at HMP Bronzefield, paid for by the charity's core charitable funding.

Advance's Minerva (AM) WrapAround service

This project, led by Advance, has been allocated a total of £2,996,940 from the MOPAC co-commissioning grant to deliver wrap around support services for women and girls in contact with the criminal justice system aged 15 years and above from July 2018 to March 2021 across 15 boroughs.

Operating through a diverse referral process, the service will provide women in contact with the criminal justice system with wrap around support services including keyworker support, group-work, mentoring, and other specialist support. It will be delivered by a consortium of Advance (consortium lead), receiving referrals from London CRC and the National Probation Service and others, and working with all the London boroughs receiving the service and Turning Point (funded by Public Health England), Hibiscus Initiatives, Clean Break, Working Chance, Housing for Women, Airnetwork, Heart & Mind, Young Mums Support Network, SafeGround, Inspirit, and Prison Reform Trust (see the diagram at Figure 3 on page 15 below). Some of the partners' services are provided as an 'added value' service. All others paid for by the co-commissioned funding.

The women and girls receiving this service will have multiple complex needs including all three elements of the 'toxic trio': mental health needs, experience of domestic abuse and problematic substance use. The women will receive the service for up to 18 months. There are 12 key workers, including one young persons' key worker, with an expected caseload of up to 30 clients each and a total expectation of 700 women per year (613 in the first year because of the staggered start). The expectation is for weekly or fortnightly engagement for the first six months and regular engagement for the remaining 12 months. One specialist foreign nationals key-worker is provided by Hibiscus and shared with the South London Alliance. There is also a peer mentoring service, with 15 peer mentors with lived experiences supporting at least 30 current service-users.

Turning Point provides a drop-in clinic with key workers for drug treatment at Advance's women's centre in Hammersmith, funded by Public Health England. Advance plans to seek additional funding for group work, drug treatment and counselling. Domestic abuse services are provided as an 'added value' service by Advance paid for through its own charitable funding, including Survivor Phoenix workshops.

South London Alliance

The South London Alliance is a collaborative project from 1 July 2018 to 31 March 2021, overseen by Lambeth Borough Council and with Women in Prison as the delivery lead, for a whole system approach for women across six South London local authorities. The partners are National Probation Service (London), London CRC, Women in Prison, Advance, Pecan, Housing for Women, Clean Break, Hibiscus Initiatives, Birth Companions and Working Chance. The project is funded by the MOPAC co-commissioning grant (£1,606,170) and partner investment from the six local authorities, London CRC and NHS England (£335,366). The total cost for this model is £1,941,539 over three years.²⁵

The service will put in place a whole system approach to supporting women including early intervention, triage, resettlement and increasing women's centre provision.

Advance 'Minerva WrapAround' and South London Alliance outcomes

The co-commissioned services have agreed the following outcomes, with baselines and targets to be confirmed during the mobilisation period (not all targets have been set for both services):

- 10% reduction in reoffending by women after 12 months of entering the service
- 10% reduction in children going into care as a result of the imprisonment of their mother
- Reduction in the demand of this cohort on the criminal justice service (target to be agreed)
- Decrease in the use of custodial sentences as a percentage of all disposals for women following the completion of a pre-sentence report (target to be agreed)
- 65% improvement in housing resettlement of women in contact with the criminal justice system
- 70% improvement in the health and wellbeing of women in contact with the criminal justice system
- Reduction in the impact of violence against women and girls, including 70% increase in women feeling safer from gender-based violence and abuse (target to be agreed)
- 70% increase in confidence in gaining employment
- 70% increase in financial management
- 65% reduction in problematic substance use
- 70% reporting enhanced parenting skills
- 70% increase in improved emotional management and wellbeing, and in reporting healthier relationships, in young women aged 15 to 24
- Reduction in offending behaviours by women (target to be agreed).

Metropolitan Police Service female offender diversion pilot

The Metropolitan Police Service (MPS) will pilot the diversion of women who have committed low-level offences and are eligible for an out of court disposal. In the pilot areas, where a woman has admitted committing an offence and it is decided that the matter should be dealt with by a conditional caution, the woman will be referred to support services commissioned through MOPAC. By making their referral a condition of their caution, a failure to engage with the support services may render them liable to prosecution for the original offence. The programme will be piloted over a two-year period in three basic command units (BCUs) with an aspiration to implement it across the MPS subsequently.

The pilot supports the whole system approach to support women in key areas and prevent reoffending. The MPS will also support the awareness of the wrap around services provided by Advance and the South London Alliance so that all women who come in to contact with the criminal justice sector are aware of the support available to them.

²⁵ Female offending: South London Alliance partnership briefing, July 2018

London CRC

London CRC are committed to working with women in a trauma informed way. They have therefore developed a two-day trauma informed training programme for all Offender Managers managing female service users. The training embeds the core principles of working in a trauma informed way, as well as providing practical advice to staff about managing vicarious trauma themselves. The CRC's office locations have identified female only reporting times, reducing the risk of any further trauma in attending probation. London CRC also employs two female support workers that provide an enhanced service to women across London, supporting women to attend appointments, engage with their sentence plans and improve compliance.

In addition to this, London CRC is committed to ensuring that they provide a range and volume of interventions beyond the keyworker service that they have funded. These include three group work programmes; Thinking Ahead for Women, Healing Trauma and Making Amends (a restorative justice programme). The CRC has committed to delivering female only Community Payback projects where possible, and is currently reviewing the content, delivery and location for its female only Senior Attendance Centres.

National Probation Service (London)

The National Probation Service (NPS) London is currently one of seven NPS Divisions (England and Wales). Its priority is to protect the public by the effective rehabilitation of high risk of harm offenders, by tackling the causes of offending and enabling men and women to turn their lives around. The NPS is also responsible for preparing pre-sentence reports for the courts, to assist them with selecting the most appropriate sentence. The NPS works with men and women in prison to prepare them for release in accordance with the conditions of their licence and they manage the Approved Premises (AP) estate for those high-risk offenders requiring AP residence. The NPS also has an important role in communicating and prioritising the wellbeing of victims of sexual and violent offences where the offender has received a prison sentence of 12 months or more.

NPS London supervises between 600-700 women, around half of whom are in custody at any one time. Its Women Offender's Board and Divisional Plan is led by NPS London's Head of Stakeholder Engagement and implemented by its Women's Strategy Lead. NPS London's priority is to reduce the use of short-term custody for women in London. It works in partnership with the London CRC and the MOPAC co-commissioned services, as well as Liaison and Diversion (L&D) service providers and other voluntary and community sector (VCS) organisations to ensure NPS women can access a trauma informed service. It also delivers the women's personality disordered pathway service in conjunction with NHS England.

The NPS aims to reduce the number of women entering custody by 20% by mid-2020. The NPS' vision is for:

- A trauma informed pre-sentence report to be completed for every woman going through the London courts, preferably under a specialist court system;
- All women to be offered a female Pre-Sentence Report writer and Offender Manager;
- Women in the community supervised in a women-only environment, wherever feasible, whether they are serving a community sentence or are under licence;
- Women who present a high risk of harm to be able to access suitable approved premises in London as part of their release plan;
- Women to have the opportunity to engage with community services before their release, as part of their rehabilitation; and
- Continuation of the Women's Personality Disorder Pathway delivered in conjunction with health services.

Local authorities

By working through existing multi-agency partnerships, and with women with multiple needs, local authority leadership can ensure strategic oversight and collaboration to develop innovative solutions to transform the lives of women and their families.²⁶ The co-commissioning model for investment in women's services in London has already yielded positive results, particularly in the engagement of local authorities as both commissioners and partner investors in services. The full engagement of local authorities is critical to raising awareness of services, ensuring appropriate referrals and supporting the development of pathways into housing, treatment for mental health needs and problematic substance use, and social care for women in contact with the criminal justice system.

Social work and social care support can be key in achieving positive change for women with multiple needs both in prison and in the community. Recent legal and policy changes - including the Care Act 2015, the Homelessness Reduction Act 2018, universal credit, social services reform, the roll out of liaison and diversion services, recommissioning of appropriate adult services and the major reorganisation of HM Prisons and Probation Service – all point to the critical need for local authorities to take on a leadership role in support of women with multiple needs. Recommendations suggesting ways in which local authorities can help make a positive difference are set out in the Prison Reform Trust's report 'Leading change', updated in 2018.²⁷ This includes the suggestion that a system wide strategy for working with women with multiple needs should sit with each local authority's Health and Wellbeing Board.²⁸

A number of London's local authorities have invested in the South London Alliance (for which the London Borough of Lambeth is the lead) and the Advance's Minerva WrapAround services. Public health and drug and alcohol treatment services also perform a key role. London boroughs anticipate a reduction in their core crime prevention budgets from City Hall, which will create a more challenging context locally.

Liaison and diversion services

Liaison and Diversion (L&D) services are commissioned by NHS England London and operate across the whole of the capital to identify people who have mental health, learning disability, substance misuse or other vulnerabilities when they first come into contact with the criminal justice system as suspects, defendants or offenders. The service can then support people through the early stages of criminal system pathway, refer them for appropriate health or social care or enable them to be diverted away from the criminal justice system into a more appropriate setting, if required.

L&D services aim to improve overall health outcomes for people and to support people in the reduction of reoffending. They also aim to identify people's vulnerabilities earlier on, reducing the likelihood that people will reach a crisis point and helping to ensure the right support can be put in place from the start. L&D services record all information about a person's health needs and share this information with their consent with the police, probation and the judiciary to enable informed decisions about case management, sentencing and disposal options.

L&D services will support women to access women specific health or social care services where available. In London, L&D service providers have a women's lead to act as an expert on women's specific needs and to identify local women specific referral pathways, ensuring that the service responds to women's specific needs.

²⁶ Prison Reform Trust (2018) Leading change: The role of local authorities in supporting women with multiple needs, London: PRT

²⁷ Ibid

²⁸ Ibid

4. Investment and sustainability strategy

The Signatories to the Statement of Shared Commitments are committed to establishing what the whole system approach will cost and how 'in kind' / cash investment can best be levered in.

Strategies for investment and sustainability must recognise the need for core investment and a mixed investment model, including 'in kind' and financial support, with local authorities, health, and voluntary sector providers working together to increase coverage, ensure sustainability and drive integration of services; drawing in investment from a range of sources and building voluntary sector resilience through a mixed investment model and consortia arrangements.

This may include developing a cost/benefit analysis and comparison with other models such as Greater Manchester. There is a need to develop a business case to potential 'in kind' or cash investors which specifies what is on offer from the whole system approach, what resources are needed and where they could be accessed.

Work already underway as part of discussions about justice devolution in London will assist with this. The Memorandum of Understanding 'Working towards justice devolution' contains a commitment for the Ministry of Justice to explore options jointly with MOPAC for financial devolution with a focus on female offending. This commitment is being taken forward in two parts:

- The Ministry of Justice is conducting a piece of work to understand in detail the different possible models for financial devolution around women's custody budgets to London. This will identify the legal, operational and financial constraints and risks of different models and model how the finances of different options could work in practice.
- The Ministry of Justice and MOPAC are jointly commissioning research to map the current spend on female offenders in London to provide an understanding of levels of investment, savings and different funding streams.

The work being undertaken by the Ministry of Justice will consider how and the mechanism by which additional money for the institution and ongoing running costs of a potential whole system approach in London could be secured. This will involve considering:

- Mechanisms for releasing money from custody budgets and other Ministry of Justice budgets, justified by improved outcomes and cashable savings for the Ministry of Justice.
- Justice reinvestment approaches to bring in money from different parts of government in a fund to support a London whole system approach.
- Other funding sources that might be available to MOPAC to fund a whole system approach.

The joint work being commissioned will:

- Provide an understanding of current landscape of services for women in contact with the criminal justice system in London and the current investment picture.
- Provide the likely costs for delivering a whole systems approach to women in London, both as a total investment cost and unit costs per woman.
- Identify the savings associated with investment in a whole system approach.

Figure 1: Map of women specific services commissioned by London CRC and MOPAC, October 2018 (Source: London CRC)

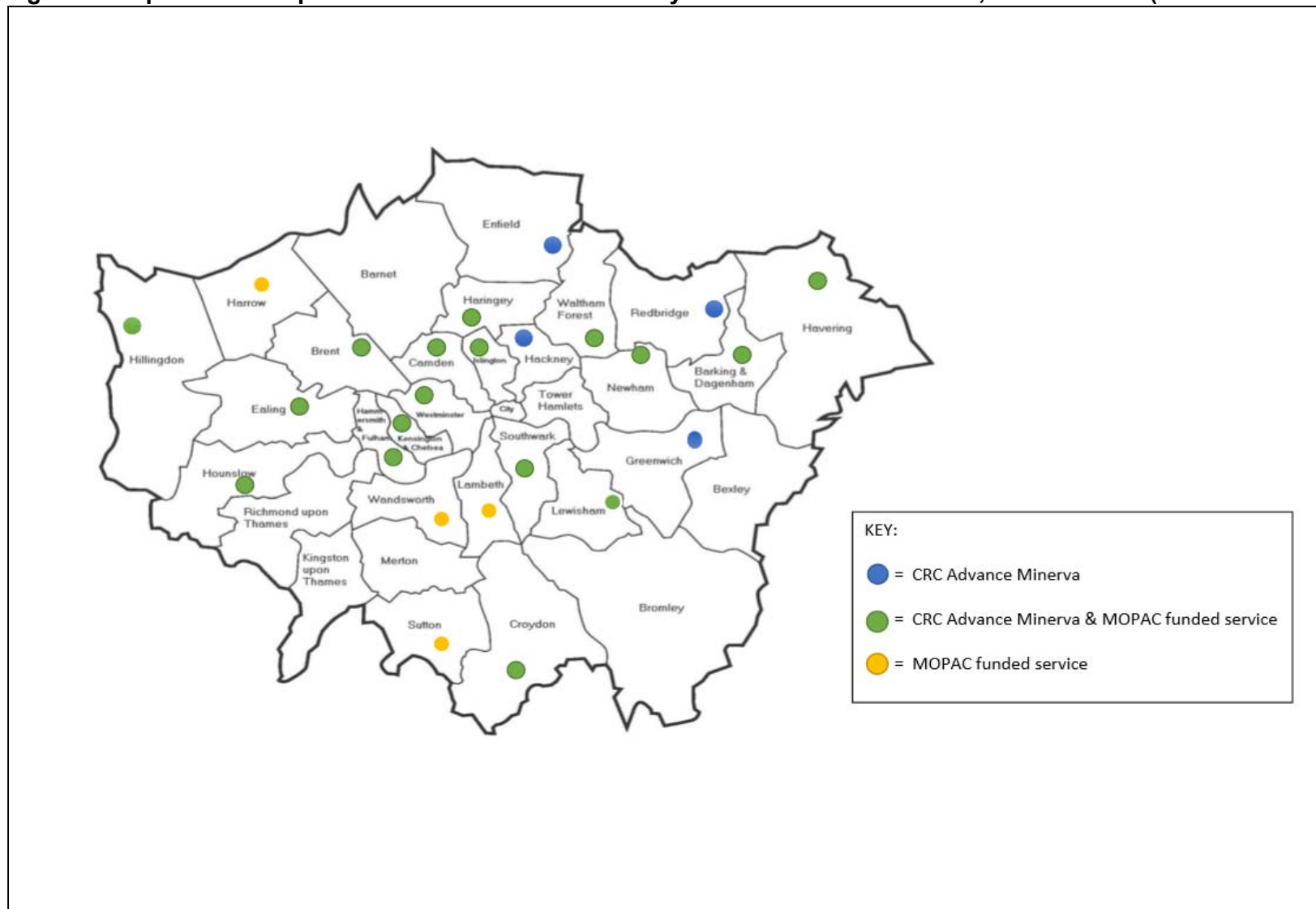
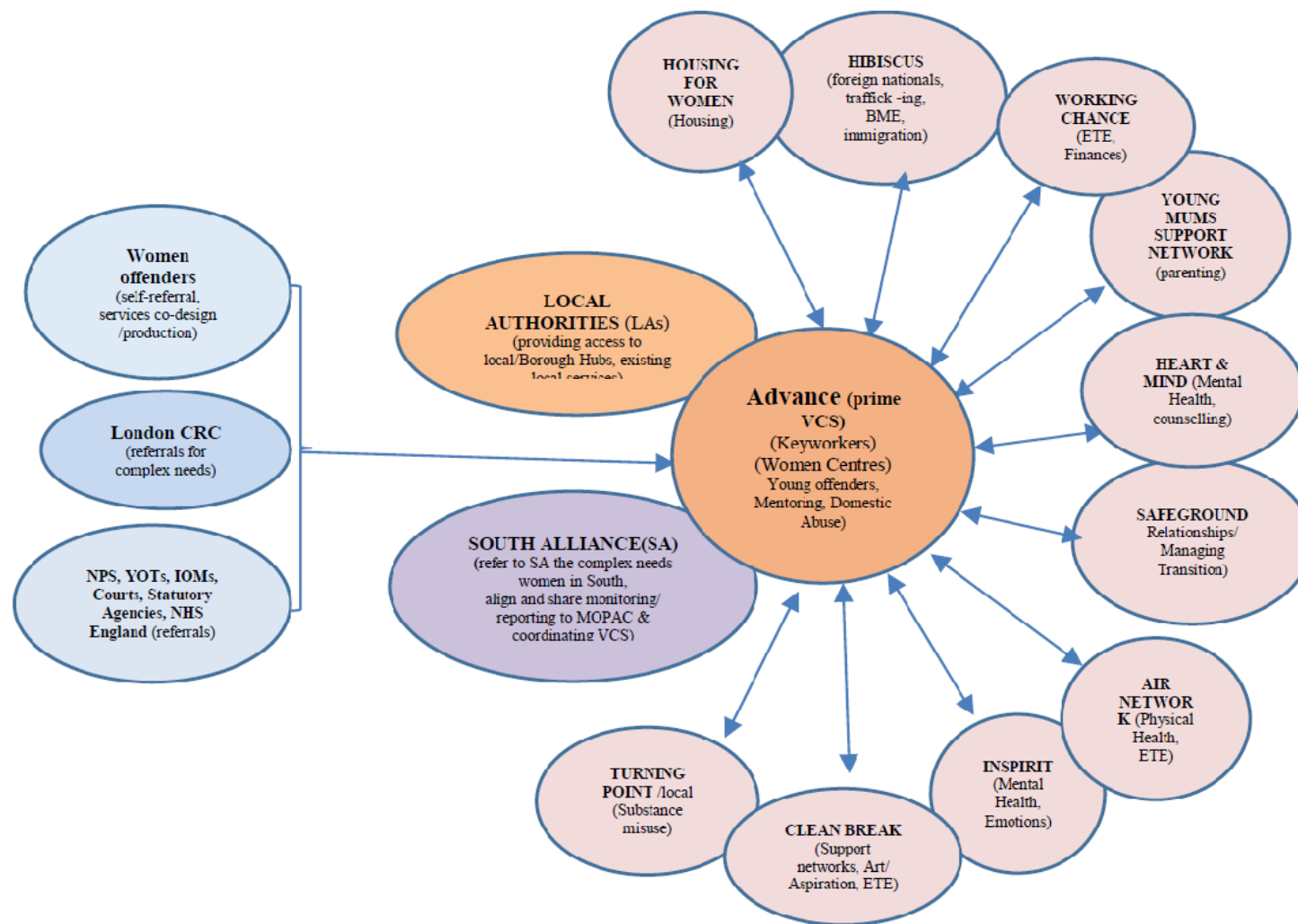


Figure 2: Table of women specific services commissioned by London CRC and MOPAC by borough (Sources: MOPAC London Crime Prevention Fund co-commissioned services for Women Offenders briefing and London CRC)

Advance's Minerva CRC service (21 boroughs)	Advance's Minerva WrapAround service (15 boroughs)	South London Alliance service (6 boroughs in South London)	No contracted service (7 boroughs)
Barking Dagenham Havering Redbridge Waltham Forest Newham Hackney Haringey Enfield Camden Islington Kensington and Chelsea Westminster Hammersmith and Fulham Brent Ealing Hounslow Hillingdon Southwark Lewisham Croydon	Barking & Dagenham Brent Camden Ealing Hammersmith & Fulham Hounslow Haringey Harrow Havering Hillingdon Islington Kensington & Chelsea Newham Waltham Forest Westminster	Croydon Lambeth Lewisham Southwark Sutton Wandsworth	Barnet Bexley Bromley Kingston on Thames Merton Richmond on Thames Tower Hamlets

Figure 3

Minerva WrapAround Services Partnership



5. Thematic analysis - next steps towards achieving a whole system approach

Introduction

The Signatories to the Statement of Shared Commitments share an ambition to implement an innovative whole system approach throughout the capital for the treatment of women in contact with the criminal justice system or at risk of such contact. Building on existing provision and learning from the evidence base, including models of good practice within and outside London²⁹, the Signatories aim to establish London as a national and international leader in achieving better outcomes for women and their families, reducing the use of short custodial sentences and reducing offending by women.

This section draws on the evidence base and feedback provided by a range of agencies through the Blueprint consultation, including the consultation event held on 28 November 2018. It is intended to help inform MOPAC's development of the Action Plan and to provide a starting point for discussion and joint work by the Blueprint Delivery Group in implementing a whole system approach.

Summary of current provision in London

Current provision is described in more detail in Section 3 of this Annex. In summary, the South London Alliance and Advance's Minerva WrapAround services have been designed to deliver a whole system approach to women in London who are in contact with the criminal justice system or at risk of such contact. The lead providers, Advance and Women in Prison, are delivering the service with partners through their women's centres and hubs, delivering holistic, specialist, one-to-one support and engaging group interventions tailored to women's needs. The work is delivered in the community and 'through the gate', supporting women leaving prison. The service covers 21 of London's 32 boroughs.

The model allows for diverse referrals of women who are in contact with the criminal justice system or at risk of such contact. The launch of the Metropolitan Police Service women's diversion pilot in 2019 will open up new referral pathways at the point of arrest in the three boroughs taking part in the pilot. Further women specific services are available under an existing contract between Advance and London CRC for the delivery of services to sentenced women. Seven boroughs remain without any women specific services.

The National Probation Service (London) is committed to reducing the number of women entering custody by 20% and London CRC is preparing to launch a detailed, ambitious strategy for the development of specialist practice with women and improving outcomes, including strategies to provide women specific services in all boroughs.

Drawing on the evidence base to achieve a whole system approach

The Signatories to the Statement of Shared Commitments aim to learn from existing good practice in London and models elsewhere in order to build on existing provision and develop a whole system approach in the capital. This includes learning from the whole system approach that has been in operation in Greater Manchester since 2014.

The evaluation of the Greater Manchester model has found that the whole system approach provides a good example of a gendered approach to supporting women in contact with the criminal justice system or at risk of offending and has been successful in responding to a number of its key aims.³⁰ Challenges have been encountered in some areas, for example:

²⁹ Ministry of Justice (2018) A Whole System Approach for Female Offenders – Emerging evidence, London: MoJ

³⁰ Kinsella, R. et al (2018) Whole System Approach for Women Offenders Final Evaluation Report, Manchester: Policy Evaluation & Research Unit, Manchester Metropolitan University

- Women referred at point of arrest, women sentenced via the problem-solving court (including those at risk of custody) and women released from prison are not reaching the women's centres in the numbers anticipated.
- The changes in the policy landscape and impact of austerity has created challenges.
- There have been challenges in establishing the problem-solving court element of the approach.
- Partnership working varies dependent on partners' understanding, awareness and involvement with the approach.
- There is a perception of uneven coverage geographically across the region.
- Although a wide range of women are engaging with the centres, the data suggests that lower numbers than would be expected of both young women and BAME women are accessing the services.

Solutions are proposed to all the above areas of challenge in the evaluation and the Signatories are committed to consulting with colleagues in Greater Manchester and elsewhere and examining the evidence to ensure lessons are learned from areas of challenge and success, in order to inform the development of practice in London.

Areas for development – cross-cutting themes

Consultation discussions identified a number of cross-cutting areas requiring further development in order to achieve a whole system approach in London. It is proposed that these should be taken into account by MOPAC and the Blueprint Delivery Group in development of the Action Plan:

- **Improving multi-agency working with women with complex needs**

The lack of formalised joint working arrangements with certain key agencies has been identified by women's services as a barrier to achieving progress in individual cases, with key workers having to invest considerable time on women's behalf to pursue enquiries and applications in relation to welfare benefits, housing, access to mental health treatment and access to treatment for problematic substance use. These barriers to progress could be overcome through the development of formalised joint working arrangements between women's services and the Department for Work and Pensions, local authority housing departments, mental health treatment services and problematic substance use treatment services, for example using the MARAC model.

MARACs may provide a useful model for improving multi-agency working with women with multiple complex needs who are in contact with the criminal justice system or at risk of such contact. This could provide a forum for professionals to meet and focus together on the individual woman's situation from multiple perspectives offering a foundation for individual agencies and officers to take ownership and responsibility for problem solving. A specialist advocate, equivalent to an Independent Domestic Violence Advisor (IDVA) or Independent Sexual Violence Advisor (ISVA), would support the woman and offer expertise for all agencies involved. This could provide a strong foundation for the development of joint working protocols between agencies in order to facilitate women's access to suitable housing, welfare benefits, mental health services and treatment for problematic substance use.

- **Shared understanding of the value of the voluntary approach**

Research shows that services are more effective in supporting women's rehabilitation where their engagement is voluntary and the sharing of any information about women's engagement is consent-based. This is the basis of delivery for women

specific services. However, where defendants are on the cusp of custody there is a perception that sentencers may be less likely to impose a community order where engagement with support services is voluntary rather than enforceable. The Signatories have identified the need to work together to address this tension by providing information to the judiciary and court clerks explaining the evidence base for the greater effectiveness of a voluntary approach, and by developing innovative, pragmatic, consent-based approaches to the delivery of services to women as part of community orders.

- **Specialist, trauma informed court processes**

The lack of specialist courts for women defendants in London, and the tensions between speedy justice and trauma informed approaches, including full pre-sentence reports, have been identified as a barrier to achieving a whole system approach for women in London. As well as the Greater Manchester model, the specialist domestic abuse court in London may offer a helpful model for achieving progress in this area in the capital. Engagement with the judiciary and central government will also be key in overcoming some of these barriers.

- **Geographical gaps**

Some areas of London currently have no women specific provision. A particular need has been identified in East London, Tower Hamlets and Redbridge.

- **Specialist provision**

Further work needs to be done to establish what additional specialist provision is required in order to ensure the needs of particular groups are met, including young women; Gypsy Roma and Traveller women, and Black, Asian and minority ethnic women and those of minority faiths. A particular need has already been identified for more specialist provision for foreign national women.

Thematic analysis

Taking account of existing women specific provision in London, the rest of this section consists of a thematic analysis of the challenges and opportunities for developing a whole system approach. This includes evidence of need, consultation feedback, existing provision, gaps and challenges, proposed next steps, expert partners. It is proposed that this should be taken into account by MOPAC and the Blueprint Delivery Group in development of the Action Plan.

The section is organised under the following headings:

Theme	Page
Accommodation and resettlement	18
Black, Asian and minority ethnic women and women of minority faiths	21
Children and families	23
Domestic abuse and sexual abuse	24
Drug and alcohol treatment	25
Education, training and employment	27
Exploitation and gangs	28
Foreign national women	29
LGBT women	31
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Accommodation and resettlement

Evidence of need

Accommodation is key to developing an effective whole systems approach. It is an area of significant need for women in contact with the criminal justice system and a crucial factor in resettlement from prison and rehabilitation in the community. Women in contact with the criminal justice system tend to have more complex needs which are compounded by experiences of homelessness or unsafe housing. A lack of safe, stable housing can undermine efforts to engage with community-based interventions, including probation, drug and alcohol services and mental health support.

Homelessness and insecure accommodation are known factors in offending and reoffending.³¹ For women who are homeless or trapped in unsafe and insecure housing, often at risk of abuse or exploitation, their housing needs can place them at a higher risk of offending and harm. Research has also shown that, as 'hidden homeless', women tend to be under-counted in rough sleeping and homelessness statistics. Identifying and responding to the housing needs of vulnerable women earlier could reduce the number being drawn into offending and the criminal justice system.

As with the wider prison population the housing needs of women leaving prison, whether following remand or a custodial sentence, often remain unmet. Data from women's prisons and probation services show that many women are still being released from custody into

³¹ [Home Truths: Housing for Women in the Criminal Justice System, Prison Reform Trust 2018](#)

short-term and insecure accommodation; this accounted for 38% of women between 2016-17.³² Women serving short sentences face a high risk of losing their accommodation, as housing benefit will only be paid for 13 weeks and Universal Credit for six months, and short timescales makes resettlement planning difficult.

Pressures on housing supply present unique challenges for London boroughs. The scarcity of social housing stock and affordable housing creates challenges in tackling homelessness and responding to the needs of vulnerable groups. The Homelessness Reduction Act 2017 has enhanced local authority duties in relation to homelessness prevention and intervention, with the 'Duty to Refer' for prisons and probation services introduced in October 2018.³³

The Blueprint offers London an opportunity to build on this legislative framework to improve housing pathways for women in contact with the criminal justice system and to establish greater consistency by developing shared approaches across London boroughs to:

- Preventing homelessness of women in contact with the criminal justice system or at risk of such contact;
- Supporting women's resettlement in the community on release from custody, including remand; and
- Intervening earlier and more effectively for women with complex needs to prevent homelessness and offending.

Consultation feedback

Participants in the consultation raised the following comments and questions:

- Housing and accommodation are a necessary foundation to delivering any kind of support to address all these different areas of need
- It is important to make a commitment to addressing housing needs before talking about preventing homelessness
- How can we move away from a borough by borough approach? How can better use be made of the pan-London housing reciprocal? What opportunities are there for pan-London quotas?
- Housing First provides a model of good practice
- Plans in the Blueprint could be more specific and there is an opportunity for us to identify London's specific needs and define good practice

Current provision in London

Key partners in accommodation and resettlement are local authorities, prison, probation services, housing providers and specialist voluntary sector agencies. Co-commissioned projects in London, led by Advance and Women in Prison, provide additional support around housing and resettlement, aiming for a 65% improvement in housing resettlement. Learning should be gathered from these key partners to inform effective intervention and housing pathways.

For women who are in custody, London CRC are commissioned to provide Through the Gate services to provide resettlement support before release, including help in finding accommodation. Housing needs should be identified on reception into prison and followed up in advance of release. This should include liaising with the local authority where there is a risk of homelessness and referrals to co-commissioned services for support.

³² National Female Offender Strategy, 2018 – Supporting Data Tables
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/719770/supporting-data-tables-for-the-female-offender-strategy.ods

³³ <https://www.gov.uk/government/publications/homelessness-duty-to-refer/a-guide-to-the-duty-to-refer>

Rough sleeping initiatives and supported accommodation services often work with vulnerable women with offending histories and experiences of VAWG. A better understanding needs to be developed of the links between homelessness, offending and VAWG and to identify best practice in this area, if services are to work more effectively on prevention and early intervention.

Opportunities, challenges and next steps

The following actions are proposed as next steps for discussion by the Blueprint Delivery Group:

- Building a better understanding of connections between homelessness, offending and VAWG.
- Identifying effective housing responses for women with complex needs who may be at risk of offending or reoffending.
- Gathering learning from co-commissioned projects on improving housing and resettlement outcomes for women
- Supporting local authorities in their implementation of the Homelessness Reduction Act to develop improved responses to the complex housing and homelessness needs of women with offending histories, as in line with statutory guidance (Ch.23).
- Exploring scope for pan-London approaches to assist coordination of resettlement from prison (including where women have served their sentence outside London but returning to London).
- Reviewing implementation of the statutory duty to refer and the effectiveness of referral pathways and coordination between prisons, probation services and London housing departments.
- Ensuring that the additional needs and vulnerabilities of women in contact with the criminal justice system are reflected in local homelessness strategies and policies.
- Working towards safe accommodation for women with no recourse to public funds

Strategic work could include:

- Working in collaboration to make the case for a pilot residential women's centre in London to the Ministry of Justice and shape a model which meets the specific needs of London.
- Identifying best practice and opportunity to expand specialist accommodation provision for women with complex needs and offending histories – for example, Housing for Women.
- Working with Ministry of Justice on establishing a women-specific Approved Premises in London and ensuring effective integration with local housing pathways.
- Improving consistency in published data about women's housing status on release from prison.

Expert partners

Advance
Local authority housing leads
London Councils

Housing for Women
MHCLG
Safer London

Black, Asian, minority ethnic and minority faith women

Evidence of need

Black, Asian and minority ethnic women are over represented in the criminal justice system in England and Wales³⁴. The Lammy review identified disparities in the treatment of Black, Asian and minority ethnic women in the criminal justice system compared to white women. The review recommended that the government and criminal justice agencies should 'explain or reform' any disparities and that the Ministry of Justice should take steps to address key data gaps including a detailed examination of magistrates' verdicts as they affect Black, Asian and minority ethnic women.³⁵ The government has accepted these recommendations³⁶ and an update has been published regarding progress to implement reforms³⁷.

Other recent research has identified evidence of disadvantage experienced by Black, Asian and minority ethnic women and Muslim women in the criminal justice system, a lack of criminal justice data disaggregated by both gender and ethnicity or gender and religion, and limited data about Gypsy, Roma and Traveller women.³⁸ The same research shows there are very few specialist, local services working with women from minority ethnic groups in the criminal justice system and supports the adoption of a strategic approach at national and local level to addressing these gaps and monitoring progress to achieve equal outcomes, in consultation with minority ethnic women and specialist services and with a focus on community solutions.

In London, Black, Asian and minority ethnic women made up 25% of the women sentenced to immediate custody in 2017.³⁹

Consultation feedback

- Participants in the consultation felt there was a need for more specific commitments to be put in place in the Blueprint for BAME women.
- It is important that changes in the BAME population of London are continuously taken into account.
- Discussion is needed about how BAME women will inform future commissioning and to ensure that the needs of BAME women are factored into funding decisions. This must recognise that BAME women are not a homogenous group; community support should reflect the population make-up of the local area.
- There needs to be more BAME representation in the organisations involved, including the Magistrates' Courts and women's services. Are the organisations considering these groups catering to their specific needs? Are service providers

³⁴ Ministry of Justice (2016) Black, Asian and Minority Ethnic disproportionality in the Criminal Justice System in England and Wales, London: MoJ

³⁵ Ministry of Justice (2017) The Lammy Review: An independent review into the treatment of, and outcomes for, Black, Asian and Minority Ethnic individuals in the Criminal Justice System, London: MoJ

³⁶ Ministry of Justice (2017) Government response to the Lammy review on the treatment of, and outcomes for, Black, Asian and Minority Ethnic individuals in the Criminal Justice System, London: MoJ

³⁸ See: Muslim Hands (2018) (In)visibility. Female. Muslim. Imprisoned, London: Muslim Hands; Prison Reform Trust (2017) Counted Out: Black, Asian and minority ethnic women in the criminal justice system, London: PRT; Cox, J. and Sacks-Jones, K. (2017) Double Disadvantage: The experiences of Black, Asian and Minority Ethnic women in the criminal justice system, London; Agenda and Women in Prison; Buncy, S. and Ahmed, I. (2014) Muslim Women in Prison. Second Chance Fresh Horizons: A study into the needs and experiences of Muslim women at HMP & YOI New Hall & Askham Grange prisons during custody and post-release, Bradford: HPCA and Khidmat Centres.

³⁹ Ministry of Justice (2018) Court Outcomes by Police Force Area Data Tool, Criminal Justice System statistics quarterly: December 2017, London: MoJ

representative of their client group? How is this monitored in individual organisations?

- There needs to be local training, as the BAME population differs in different areas; this needs to be recognised, especially in the Magistrates' Courts. There needs to be more training 'back of house' including court clerks and others who advise magistrates.
- There needs to be a discussion about how we engage with the small service providers who work with particular groups and to make sure that they are included in the development of the Blueprint. These non-accredited smaller BAME services often get lost and are not able to compete in the larger commissioning bids; therefore, the courts have less confidence in them and are not as likely to use them. This includes variations within individual religions; services need to allow for individual perspectives.
- BAME women can find they are not welcomed back by their community on release.
- More focus is needed on providing peer support. There should be training and education for services providers around the specific needs and requirements of BAME women in the local area. Services need to be approachable and accessible for all women.

Opportunities, challenges and next steps

Recent research has included recommendations that:⁴⁰

- Criminal justice agencies should collect and publish data disaggregated by gender, ethnicity and religion and use this to inform joint strategic needs assessments and commissioning decisions, and to monitor progress in addressing unequal outcomes.
- A strategy should be adopted to increase minority ethnic women's representation in the criminal justice workforce and culturally-informed and gender-responsive training should be provided throughout the criminal justice workforce.
- The NPS should ensure pre-sentence reports draw the court's attention to relevant cultural factors and pressures.
- National and local government should work together to ensure the provision of services to support minority ethnic women in the community, focusing on increasing and strengthening specialist services and ensuring safe spaces are available for minority ethnic women.

The Female Offender Strategy recognises that women in minority groups face unique challenges both in custody and in the community and is working to identify how voluntary sector and other organisations who work with BAME women can improve their capacity to share best practice and form networks.⁴¹ The strategy states that HMPPS is committed to working with BAME oriented organisations on implementing the Lammy review recommendation 31 to overcome barriers to subcontracting between CRCs and BAME communities to help share good practice; and that the government will provide more culturally informed training for staff in offender management and rehabilitation, to increase staff awareness of the impacts of culture, faith and sustaining family relationships for women in the criminal justice system.

It is proposed that this work and the points made above should form the starting point for discussion of next steps, to be agreed at an early stage by the Blueprint Delivery Group.

⁴⁰ Prison Reform Trust (2017) Counted Out: Black, Asian and minority ethnic women in the criminal justice system, London: PRT;

⁴¹ Ministry of Justice (2018) Female offender strategy, London: MoJ

Expert partners

Equal (formerly the Young Review)
Hibiscus Initiatives
Imkaan
Lammy Review implementation team
(MoJ)

Muslim Women in Prison Project, Khidmat
Centre, Bradford
Muslim Hands

Children and families

Evidence of need

Parental imprisonment is recognised as an adverse childhood experience (ACE), affecting a child's long-term wellbeing, health and opportunities in life.⁴² Even a short period of maternal imprisonment can be devastating.⁴³ Research suggests children whose parents are involved in the criminal justice system are twice as likely to suffer mental health problems⁴⁴, and are at higher risk of poverty, poor health and insecure finances and housing.⁴⁵ It can also treble the risk of antisocial behaviour, with the cost to the state of imprisoning mothers for non-violent offences at more than £17million over ten years⁴⁶. However, with the right support, children affected by parental imprisonment can build resilience and develop the skills they need to thrive.⁴⁷

The Female Offender Strategy recognises that “*children of imprisoned mothers may be particularly affected by a custodial sentence*” (p.9) and endorses the case for a gender specific approach to women who offend, with an emphasis on early intervention and diversion and community solutions.⁴⁸ The government has commissioned Lord Farmer to undertake a Follow On Review of the impact of maternal imprisonment which is due to report in 2019.

Consultation feedback

- Participants thought the draft blueprint contained the right commitments but felt that there needed to be further service user involvement in developing the commitments.
- There is a big gap in data. We need to know the data to understand the need.
- A stronger commitment is needed from Through the Gate providers to ask questions and obtain the data. This will allow for tailoring services to meet needs and allow for appropriate commissioning.
- It would be useful to know more about where funding would come from to implement measures requiring additional resources.
- A stronger link is needed with adult and child social care in developing the commitments.
- The commitments in the Blueprint are ambitious: how will they be delivered?
- How long will this run for once it has been signed up to? Could a change in administration stop the work?

⁴² Prison Reform Trust (2018) What about me?, London: PRT

⁴³ Baldwin and Epstein (2017) Short but not sweet: A study of the impact of short custodial sentences of mothers & their children, Leicester: DMU

⁴⁴ Murray, Farrington, Sekol & Olsen (2009) Effects of parental imprisonment on child antisocial behaviour and mental health: a systematic review, The Campbell Collaboration, University of Cambridge

⁴⁵ Smith, Grimshaw, Romeo & Knapp (2007) Poverty and disadvantage among prisoners' families, London: Joseph Rowntree Foundation

⁴⁶ New Economics Foundation (2008) Unlocking value: How we all benefit from investing in alternatives to prison for women offenders London: New Economics Foundation

⁴⁷ Prison Reform Trust (2018) What about me?, London: PRT

⁴⁸ Ministry of Justice (2018) Female Offender Strategy, London: MoJ

- Women lack trust in statutory services; this poses a big challenge as women will often not disclose that they have children through fear of social service involvement. There needs to be a system change.
- Family Liaison in prison is allocated as £84 per head, including everything from running the visitor centre through to family support. Further investment will be needed in this to achieve the commitments in the Blueprint.
- The basic needs of prisoners are not being met. This must be addressed as well as focusing on these higher aims. For example, the high costs of phone calls make it difficult for women to call their families.

Current provision in London

The co-commissioned services have agreed to aim for a 10% reduction in the number of children going into care as a result of maternal imprisonment and for 70% of women receiving their services to report enhanced parenting skills.

Opportunities, challenges and next steps

In light of existing evidence regarding the negative impact of maternal involvement in the criminal justice system, and the forthcoming report by Lord Farmer, it is proposed that discussion takes place at an early stage in the Blueprint Delivery Group to identify next steps in developing better practice in this area. This should include working with the Ministry of Justice and building working relationships with local authority children's services to help drive improvements.

Expert partners

Birth Companions
Department for Education

Directors of Children's Services
Young Mums Support Network

Domestic abuse and sexual abuse

Evidence of need

Research shows that there are strong links between women's experience of domestic and sexual abuse and coercive relationships, and their offending.⁴⁹ This has been recognised in MOPAC's strategy on tackling violence against women and girls⁵⁰, as well as the Ministry of Justice's Female Offender Strategy⁵¹ and the cross-government strategies on victims⁵² and on ending violence against women and girls⁵³.

Women can become trapped in a vicious cycle of victimisation and criminal activity. The response of criminal justice agencies to women affected by domestic abuse is key to breaking the cycle of victimisation and offending. The links between domestic abuse and women's offending were a specific area of enquiry in the government's 2018 consultation Transforming the response to domestic abuse⁵⁴; the government's response to the consultation was published in January 2019 with a draft Domestic Abuse Bill.⁵⁵

⁴⁹ Prison Reform Trust (2017) 'There's a reason we're in trouble': Domestic abuse as a driver to women's offending, London: PRT

⁵⁰ [MOPAC \(2018\) A Safer City for Women and Girls. The London Tackling Violence Against Women and Girls Strategy 2018-2021, London: MOPAC](#)

⁵¹ Ministry of Justice (2018) Female offender strategy, London: MoJ

⁵² [HM Government \(2018\) Victims strategy, London: TSO](#)

⁵³ [HM Government \(2016\) Ending violence against women and girls. Strategy: 2016-2020, London: TSO](#)

⁵⁴ [HM Government \(2018\) Transforming the response to domestic abuse. Government consultation, London: TSO](#)

⁵⁵ <https://www.gov.uk/government/publications/domestic-abuse-consultation-response-and-draft-bill>

Consultation feedback

- Participants felt there needs to be more of a focus on domestic abuse and sexual abuse in the Blueprint's statement of shared commitments, and that women should be considered more as victims, and not just offenders
- Health service providers routinely ask about domestic abuse, which increases disclosures. There needs to be more similar provision in the police / courts / probation. Do they offer IDVA services to women involved in the criminal justice system?
- There needs to be training for all Liaison and Diversion leads on women's needs; London wide communication is needed for this.
- Learning can be taken from the problem-solving courts in Manchester.
- We want to see better outcomes rather than targets.
- The challenge comes in local provision, and we end up with a postcode lottery.
- We need to ensure this effectively maps against the wider London VAWG Strategy.
- There needs to be more trauma-informed delivery and the Metropolitan Police Service and other services need to be better tailored to individual women's needs.
- How is MARAC linked to women in the criminal justice system and new victims' services?
- The links between domestic abuse and women's offending are not sufficiently taken into account.
- There needs to be a discussion around honour-based crimes, as there has been a big influx of these women in prison. This is something that the Home Office are leading on but that we need to be aware of, as these women are often victims as well.

Current provision in London

There is a range of service provision across London to support women affected by domestic abuse and sexual violence. However, service provision is not sufficient to meet need. The co-commissioned services have agreed to aim for a 70% increase in women feeling safer from domestic violence and abuse.

Opportunities, challenges and next steps

A sustained focus is needed to raise awareness of the links between women's experiences of domestic abuse and sexual violence and their offending, to facilitate disclosure by women and to ensure criminal justice responses enable women to be protected and supported, and to have their circumstances taken into account in decisions whether to prosecute, convict or imprison. It is proposed that discussion takes place in the Blueprint Delivery Group to identify next steps in driving improvements. This should include ensuring that women accused of domestic abuse offences are not automatically excluded from the MPS diversion pilot.

Expert partners

Advance
Home Office
Metropolitan Police
Refuge

Solace Women's Aid
Women in Prison
Women's Aid
Women at the Well

Drug and alcohol treatment

Evidence of need

Women (49%) are also more likely than men (29%) to report needing help with a drug problem on entry to prison. 66% of women in prison (compared to 38% of men) report committing offences to get money to buy drugs.⁵⁶ Women are nearly twice as likely as men to say they have a problem with alcohol on arrival to prison (30% compared to 16%). A further 10% of women in prison report developing a problem with using prescription medication meant for other people whilst in prison.⁵⁷

Consultation feedback

- Most of the Blueprint's commitments will be relevant to women with needs relating to problematic substance use.
- These women tend to have more complex needs and it can be hard to identify these women. Women may not want to disclose problematic substance use due to stigma.
- Male prisons have treatment wings – is there specific provision in women's prisons?
- There are issues with Through the Gate services and ensuring women leave prison with enough medication.
- Continuity of care should be ensured where possible as women move through the criminal justice system
- There should be improved information sharing about assessments between everyone involved in supporting the women, including assessments
- There should be a specific commitment on information sharing about assessments between everyone involved in supporting the woman, so that she does not have to repeat herself. However, it must also be recognised that it takes time to build trust and enable disclosure.
- There are difficulties doing assessments for pre-sentence reports. There need to be dedicated problematic substance use workers in the courts. There is a disconnect between ensuring speedy justice and undertaking comprehensive assessments.
- Health services and the criminal justice system need to work better together.
- There is no strategic approach to Drug Intervention Programme (DIP) services (either nationally or regional London level). Every borough commissions DIP differently.
- In a whole system approach, participants in the consultation would like to see:
 - Continuity of care.
 - Assessments for drug and alcohol in courts.
 - A whole system approach to the person rather than individual issues – like the Troubled Families approach.
 - Drugs workers co-located with probation services or at women's centres.
- Challenges and barriers include the following:
 - Complexity around the release process – not knowing dates of release and women being moved around the estate so it is not known where she will be released from.
 - No political focus on problematic substance use.
 - Not all courts provide assessments.
 - Dual diagnosis – women passed between mental health and problematic substance use services and neither issue being addressed.
 - Cuts to other services mean that community drug and alcohol treatment services are picking up problems that other services should deal with.

⁵⁶ Light, M., Grant, E. and Hopkins, K. (2013) Gender differences in substance misuse and mental health amongst prisoners, London: MoJ

⁵⁷ Prison Reform Trust (2017) Bromley Briefings: Prison Factfile: Autumn 2017, London: PRT

- High threshold for statutory mental health services are a barrier to accessing mental health provision.
- People turn to drugs and alcohol as a coping mechanism or a cry for help. It is not effective just to deal with problematic substance use in isolation.
- There is no wrap around women service in seven boroughs.

Current provision in London

Public Health England have oversight of treatment services for problematic substance use nationally, with services being commissioned by public health departments in each local authority. The co-commissioned services aim to achieve a 65% reduction in problematic substance use amongst women receiving their services.

Opportunities, challenges and next steps

There are emerging opportunities to improve outcomes through the expansion of the Community Sentence Treatment Requirement⁵⁸ and in the planned expansion of liaison and diversion services. Developing formalised joint working arrangements between women's services and other agencies could help to improve multi-agency working with women with multiple complex needs who are in contact with the criminal justice system or at risk of such contact, including ensuring women receive effective treatment and support for problematic substance use. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

Clinical Commissioning Groups
Local authority public health leads

Public Health England
Turning Point

Education, training and employment (See also **Poverty and debt**)

Evidence of need

Access to education, training and employment is known to be a key factor in preventing offending and reoffending by women. Employment outcomes for women following short prison sentences are three times worse than for men; fewer than one in 10 women have a job to go to on release from prison.⁵⁹

Consultation feedback

- People leaving prison who find a job are between 6 and 9 percentage points less likely to reoffend than those who do not.⁶⁰ More attention is needed to education, training and employment within the Blueprint.
- There is a need to consider the types of employment being offered and not just focus on the stereotypical female jobs; women should be asked what they would like to do.
- The generic approaches to education, training and employment are often male focused and in male dominated environments. There is a need to be aware of this when placing women in employment and use a trauma informed approach when planning placements.

⁵⁸ See: PRT & Rethink Mental Health (2013) Mental health and learning disabilities in the criminal courts: Information for magistrates, district judges and court staff, London: PRT & Rethink Mental Health – updated in 2017: <http://www.mhldcc.org.uk/contents/17-women-in-the-criminal-justice-system-film-clip/d-alternatives-to-custody-film-clip.aspx>

⁵⁹ Prison Reform Trust (2015) Working it out: Employment for women offenders, London: PRT.

⁶⁰ Ministry of Justice (2018) Education and Employment Strategy, London: MoJ

- There is an aspirational side of gaining employment and the value and self-esteem it gives to a person also needs to be considered.
- There was a discussion about what is 'work readiness'. A woman may not be ready for one type of employment but could be ready for another type.
- Education, training and employment are often seen as afterthoughts but should be considered as part of a person's plan from the beginning.
- It can be difficult for employers to taken on women working on ROTL – this process needs to be made simpler.

Current provision in London

The co-commissioned services aim to achieve a 70% increase in confidence in gaining employment for women receiving their service.

Opportunities, challenges and next steps

Further work is needed, in consultation with expert partners, to identify how partner agencies can work together to improve support for women to gain access to education, training and employment - through early intervention and prevention, diversion and rehabilitative measures. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps. The forthcoming Government Equalities Office strategy on gender equality and economic power may present opportunities.

Expert partners

CPAG
Department for Work and Pensions

Government Equalities Office
Working Chance

Exploitation and gangs (See also **Young Women and Care Leavers, Prostitution and Trafficked Women**)

Evidence of need

The Modern Slavery Act 2015 introduced a defence for victims of modern slavery compelled to commit a criminal offence. This is increasingly being used to ensure the non-prosecution of British women and girls who are exploited and coerced into offending. Yet evidence confirms that victims of modern slavery continue to be prosecuted for crimes they were forced to commit.⁶¹

Consultation feedback

- Increasing numbers of young women attending the Abianda service are being arrested for firearms offences and drug offences. These young women are likely to have been coerced into offending, for example holding firearms or committing drug offences on behalf of others. Modern slavery legislation provides protection for them against prosecution. The perception that this legislation is being manipulated by gang members should not allow legitimate claims to be discredited.
- Services working with young women affected by gangs need to establish a trusting relationship through a compassionate approach which is clear about how they will be kept safe and how their information will be shared with other agencies. It should not be a requirement for young women to share their personal experiences. Services should be aware that young women can feel they are being used to get information about male gang members and that their safety is being compromised.

⁶¹ Prison Reform Trust (2018) Still No Way Out: Foreign national women in the criminal justice system, London: PRT

Current provision in London

A range of organisations work with women in London who are affected by exploitation and gangs, including Abianda who are commissioned to offer a 'Rescue and response' service to young women affected by these matters. This is a growing area of focus and challenge for the Metropolitan Police, the CPS and probation agencies. However, this remains a largely hidden group and there is likely to be significant unmet need amongst women whose offending is driven by exploitation and involvement with gangs.

Opportunities, challenges and next steps

Identifying women whose offending is driven by exploitation or involvement in gangs, and those who are at risk of offending in those circumstances, is a key challenge for all criminal justice agencies and women's services. There is a significant policy focus on this at national level and the Modern Slavery Act provides a framework for protecting victims of exploitation and gang involvement and non-prosecution for offences arising from these circumstances. Improvements in practice will require constant reflection on practice and close joint work between agencies, in consultation with expert partners. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

Abianda	Nia
Office of the Independent Anti-Slavery Commissioner	Redthread
Lammy Review implementation team (MoJ)	St Giles Trust
	Women at the Well

Foreign national women (See also Trafficked Women)

Evidence of need

'Foreign national offender' is a broad term encompassing those convicted of any offence without evidence of British nationality. They may have arrived in the UK as children with their parents, or may be second generation, often from former colonies; they may be asylum seekers or have indefinite leave to remain as refugees; they may be European and European Economic Area nationals or Irish nationals; they may be trafficked persons; they may have been arrested entering or leaving the UK on false documents. Also included are those who entered the UK illegally and those who came legally as students, visitors or workers. The extent to which Windrush immigrants in contact with the criminal justice system may have been wrongly designated as foreign nationals is unknown.⁶²

Foreign national women represent 8% of the general population in England and Wales⁶³ but over 12% of all women received into prison each year and nearly 19% of those remanded⁶⁴. Foreign national women can be particularly vulnerable to criminal activity due to insecure immigration status and social isolation, causing difficulties in finding legal employment and claiming benefits. Some are known to have been coerced or trafficked into offending.⁶⁵

There is a continuing overuse of remand and custodial sentences for foreign national women despite community alternatives, and a lack of commitment to address this.⁶⁶ In prison foreign

⁶² Prison Reform Trust (2018) Still No Way Out, London: PRT

⁶³ NOMIS (2011) LC2102EW – National Identity by sex by age

⁶⁴ Ministry of Justice FOI 180110013 response 7 February 2018

⁶⁵ Hales, L. & Gelsthorpe, L. (2012) The criminalization of migrant women, Cambridge: Institute of Criminology

⁶⁶ Prison Reform Trust (2018) Still No Way Out: Foreign national women in the criminal justice system, London: PRT

national women have much greater barriers to accessing open conditions, Release on Temporary Licence (ROTL) and Home Detention Curfew and are frequently denied these and by extension the rehabilitative opportunities associated with them.⁶⁷

Foreign national women in prison experience particular vulnerabilities and often report feeling isolated, unsafe, disempowered and confused about the criminal justice process. This is exacerbated by language barriers, cultural differences, additional immigration proceedings, the threat of removal, lack of recourse to public funds and a lack of specialist services.⁶⁸

Consultation feedback

- Participants in the consultation felt that foreign national women and trafficked women should be considered under separate thematic headings due to the distinct problems they face. Definitions of both foreign national women and trafficked women should be put in the blueprint so that people can have more of an understanding.
- There needs to be increased specialist and culturally informed training for everyone involved in working with these women in the criminal justice system, including prison staff, CRC, NPS and other agencies involved.
- There is a data gap surrounding this group of women and as they make up such a small proportion they are often 'forgotten'.
- Foreign national women are at an increased risk of staying with abusive partners.
- They may also remain in prison at the end of their sentence under immigration powers
- Although there is a commitment to achieving equality it needs to be stated how we will achieve this.
- It is important to make sure that women understand what is happening to them, including possible deportation, and that they are understood by those working with them. There need to be methods in place to overcome language barriers and other communication issues.
- There needs to be systemic change so that meeting the needs of foreign national women is included as a contractual requirement, as they are often marginalised at this stage. As the women often have no access to public funds, certain organisations may not be able to work with them. It is often assumed that if the women are being deported they do not need resettlement support however this is not true and needs to be addressed.
- The issues around the lack of ROTL use and the over use of remand for these women must be recognised and there needs to be a link with the Home Office to discuss these issues so that they are not seen as such a risky group. Probation and the Home Office need to work together to increase opportunities for ROTL for these women.
- Availability of immigration advice should be a key consideration/ there needs to be improved availability of immigration advice. There needs to be more expertise involved so that these women are able to understand the issues they are facing. Services need to be made more accessible. Independent advisors should be available whom the women feel comfortable and safe talking to.

⁶⁷ Prison Reform Trust (2018) Still No Way Out: Foreign national women in the criminal justice system, London: PRT

⁶⁸ Prison Reform Trust (2018) Still No Way Out: Foreign national women in the criminal justice system, London: PRT

Current provision in London

One key worker is currently employed to meet the needs of all women engaged in the co-commissioned services across London, provided by Hibiscus Initiatives. There is likely to be significant unmet need.

Opportunities, challenges and next steps

In order to ensure there is progress in meeting the needs of foreign national women in contact with the criminal justice system in London, there needs to be a continual focus on developing awareness amongst frontline criminal justice workers about the specific needs and characteristics of foreign national women and a commitment to ensuring they have equal access to preventative and diversionary measures and support services. This requires strong leadership, investment of resources and a commitment to cultural change. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

AIRE Centre
Bail for Immigration Detainees (BID)
Hibiscus Initiatives

Office of the Independent Anti-Slavery
Commissioner
Lammy Review implementation team
(MoJ)

LGBT women

Evidence of need

LGBT women are known to have specific needs which require attention in order to ensure they have equal access to fair treatment and opportunities for diversion and rehabilitation in the criminal justice process. Consultation discussions indicate there is a lack of information about the number of LGBT women in London in contact with the criminal justice system, the nature of their needs and the extent to which these are being met.

Consultation feedback

- There is a lack of information about how many LGBT women are in contact with the criminal justice system; whether they are accessing services; what specialist services are available; and whether their needs are met.
- There is a need to identify or conduct research about the experiences of LGBT women in the criminal justice system; their specific needs; and how services can be made accessible to them.
- LGBT organisations such as Stonewall are valuable sources of expertise and training which could be drawn upon by those working in the criminal justice field.
- Same sex relationships in prison can create safeguarding challenges, but prisons can also be 'gay friendly' environments.
- Meeting the needs of transgender women in prison and in community services can raise safeguarding challenges but these are usually amenable to common sense solutions.

Current provision in London

There is little or no specialist provision in London for LGBT women in contact with the criminal justice system.

Opportunities, challenges and next steps

In line with equality law, the Signatories recognise the value of creating inclusive and accepting cultures in institutions, celebrating difference and challenging discriminatory

attitudes and behaviours in order to ensure that LGBT women can be their authentic selves and have their needs met throughout the criminal justice process.

MOPAC's equality impact assessment of the Blueprint will include consideration of how partners can work together to ensure it addresses the needs of LGBT women. Further steps for ensuring progress in London in meeting the needs of LGBT women in contact with the criminal justice system would include gathering evidence about the extent of need and the accessibility of current provision and drawing in expertise from outside partners such as Stonewall in order to inform measures to improve the response to LGBT women. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

Galop

Stonewall

Mental health and learning disability

Evidence of need

Women are nearly twice as likely as men in prison to be identified as suffering from anxiety and depression (49% compared to 23%), and more than three times as likely as the general population. 46% of women in prison report having attempted suicide at some point in their lives. This is twice the rate of male prisoners and more than seven times higher than the general population.⁶⁹

The prison environment cannot adequately deliver treatment and support for mental illnesses. A lack of training can mean serious mental health problems are not identified at earlier stages in the criminal justice system nor taken into account at charging or sentencing stages. As a result, women who suffer from mental illness are not diverted to more appropriate services and can receive inappropriate custodial sentences. Funding issues and a lack of mental health services in the community can mean women with severe and enduring mental illnesses cannot access the support and treatment they need and as such are more likely to come into contact with the police and be held in custody.

In recent research on long-term imprisonment, women in prison reported an acutely more painful experience than men. This was linked to separation from their children and family and the loss of relationships, experiences of abuse and trauma in pre-prison life, the strain on their mental health and the lack of control, privacy and trust inside prison.⁷⁰

Around 2% of the general population has a learning disability compared to around 7% of people in contact with the criminal justice system⁷¹; women prisoners are slightly more likely than male prisoners to have a learning disability⁷². Despite such disproportionality, women with learning disabilities in the criminal justice system have received little attention and, as a group, are under-researched.⁷³

⁶⁹ Prison Reform Trust (2017) Bromley Briefings: Prison Factfile: Autumn 2017, London: PRT

⁷⁰ Crewe, B., Hulley, S. and Wright, S. (2017) 'The Gendered Pains of Life Imprisonment', *The British Journal of Criminology*, 57 (6), pp.1359–1378.

⁷¹ NHS England (2016) Strategic direction for health services in the justice system: 2016-2020, Leeds: NHS England

⁷² Mottram, P. G. (2007) HMP Liverpool, Styal and Hindley Study Report, Liverpool: University of Liverpool

⁷³ See the Prison Reform Trust's forthcoming report, due for publication in partnership with KeyRing in Spring 2019: *Out of the Shadows – Women with learning disabilities in contact with or on the edges of the criminal justice system*

The Transforming Care service model for commissioners of health and social care services highlights people with a learning disability and/or autism whose behaviour places them at risk of contact with the police as a distinct group 'because their specific needs have not always been recognised'. Limited data exist concerning women with learning disabilities and/or autism, and councils should ensure they are involved in designing local responses that best meet their needs.⁷⁴

Lord Bradley's review into people with mental health problems and learning disabilities in the criminal justice system identified that failure to identify need and to provide support at an early stage is the reason why some people offend.⁷⁵

In the 1998 Adult Psychiatric Morbidity Survey of prisoners, 90% of prisoners had one or more of the five psychiatric disorders studied (psychosis, neurosis, personality disorder, hazardous drink and drug dependence).

Consultation feedback

- Community mental health services should be consulted on the Blueprint.
- There is a disconnect between care in prison and post-release.
- It was felt that 'through the gate' services are not supporting people sufficiently and there is no proper handover between prison healthcare and the NHS; this is specifically evident in cases where the prisoner is released with 72 hours' worth of medication.
- Trying to register with a doctor and obtain medication subsequently is very difficult especially if they are released on a Friday.
- A lot of people have mental health problems without any formal diagnosis which results in sufferers falling through the cracks.
- Mental health problems are often part of interconnected and complicated multiple needs particularly involving problematic substance use and housing problems.
- Support needs to be trauma informed with true 'Through the Gate' support utilising arrangements akin to multi-agency hubs such as MASH and MAPPA. Hand holding may be needed for service users to get them to appointments.
- There needs to be greater understanding and use by courts of community orders for treatment; some courts outside London receive lunchtime training sessions about the available options and powers.
- The service user should be involved in the decisions, it should not be something that happens to them.

Current provision in London

The co-commissioned services aim to achieve a 70% improvement in the health and wellbeing of women in contact with the criminal justice system and (Advance only) a 70% increase in improved emotional management and wellbeing, and in reporting healthier relationships, in young women aged 15 to 24. Liaison and diversion services are available across London to varying levels and work is ongoing to increase coverage across London and to achieve better pathways for women to access the right support.

Opportunities, challenges and next steps

There are emerging opportunities to improve outcomes through the expansion of the Community Sentence Treatment Requirement⁷⁶ and in the planned expansion of liaison and

⁷⁴ Prison Reform Trust (2018) Leading Change, London: PRT

⁷⁵ Department of Health (2009) The Bradley Report, London: DH

⁷⁶ See: PRT & Rethink Mental Health (2013) Mental health and learning disabilities in the criminal courts: Information for magistrates, district judges and court staff, London: PRT & Rethink Mental Health – updated in

diversion services. Developing formalised joint working arrangements between women's services and other agencies could help to improve multi-agency working with women with multiple complex needs who are in contact with the criminal justice system or at risk of such contact, including ensuring women receive effective mental health treatment and support. The Prison Reform Trust plans to publish research with KeyRing in 2019 about women with learning disabilities in the criminal justice system. Specific attention is required, in consultation with expert partners, to improve practice in relation to these women. It is proposed that these matters should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

The Prison Reform Trust commissioned the national mental health charity Together for Mental Wellbeing to conduct training for criminal justice practitioners, professionals and members of the judiciary in London in 2017, on the specific needs of women in the criminal justice system. Their subsequent report gives an overview of the training and makes recommendations for the further development of training modules and how they might be delivered.⁷⁷

The ongoing need for improvements in gendered responses to women affected by personality disorder is recognised in the government's Female Offender Strategy which refers to the women offender personality disorder pathway, an integrated network of services for women offenders managed by the NPS (in custody and the community) with a diagnosis of 'personality disorder.'

The pathway's aim is to improve public protection and mental wellbeing, and address women's offending behaviour. Interventions are psychologically-informed, gender-informed and trauma-informed. The Ministry of Justice has been working with NHS England to promote the delivery of this pathway, and services have increased threefold since 2013. The MoJ aims to work with health partners to replicate these holistic care models across prison healthcare in the Women's Estate. This is a key area of focus for NPS (London) and the co-commissioned services.

Expert partners

Clinical Commissioning Groups
Community mental health services
Liaison and diversion services
KeyRing

Local authority leads
Mignon French
NHS England (London)
Together for Mental Wellbeing

Poverty and debt

Evidence of need

Poverty and debt are known to be drivers of women's offending; an evidence gathering exercise is required to establish the extent of this as a driver of women's offending in London.

Consultation feedback

- Questions arose whether there is a good enough data set to understand the number of women going into prison for an original debt issue. Women in Prison may have data; MOPAC do not.

2017: <http://www.mhldcc.org.uk/contents/17-women-in-the-criminal-justice-system-film-clip/d-alternatives-to-custody-film-clip.aspx>

⁷⁷ PRT (2018) Responding to the needs of women in the criminal justice system, London: PRT

- Non-payment of TV licence disproportionately affects women for a number of reasons, including that enforcement officers go during the day (when a woman is more likely to be home) and women are more likely to open the door and engage in conversation.
- The rollout of Universal Credit has had a negative impact.
- The discharge grant when leaving prison is only £46⁷⁸; (slightly higher for those with No Fixed Abode); this has not increased over time and barely provides someone with a single night of accommodation.
- There need to be better links between services in prison and on the outside.

Current provision in London

The co-commissioned services aim to achieve a 70% increase in financial management for women receiving their services. Consultation participants asked for this target to be clarified.

Opportunities, challenges and next steps

Further work is needed, in consultation with expert partners, to identify how poverty and debt can drive women's offending in London and how all partner agencies can work together to ensure that opportunities are taken at every stage to support women where poverty and debt may be a driver of their offending - through early intervention and prevention, diversion and rehabilitative measures – and to ensure that this is taken into account in decisions throughout the criminal justice process and access to support. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

CPAG
Department for Work and Pensions

Working Chance

Prostitution

Evidence of need

Involvement in prostitution is known to be a risk factor for many vulnerable women including women involved with the criminal justice system. There is also a known connection between prostitution and trafficking. Advance worked with 1,600 women last year and one in four disclosed being involved in prostitution; it is likely that the true figure is much higher. However, there is a lack of services and investment across London in supporting women engaged in prostitution. An evidence gathering exercise is required to establish the extent of prostitution as a factor linked to women's offending in London.

Consultation feedback

- Prostitution needs to be considered as a stand-alone area of need in the Blueprint.
- Prostitution needs to be everyone's business, as with domestic abuse and sexual violence; everyone needs to ask questions around prostitution and everyone needs to feel confident in responding to a women's needs in relation to this.
- Training for judges, magistrates and police is required.
- A trauma informed approach should be used when working with women involved in prostitution and an understanding about the cycle of abuse that they face, especially that they will be very unlikely to report abuse to the police.
- Are women engaged in prostitution going to be included in the police diversion trial due to start next year?
- There is a lack of housing and refuge provision for women involved in prostitution.

⁷⁸ National Offender Management Service (2011) Discharge PSI 25/2011. London: NOMS Agency Board

- Supported housing could be helpful as part of a diversion programme to reduce the use of custody?
- Transition from young women support to adult support is crucial; there is a big change around how the woman is treated.
- Homicide reviews are needed for women engaged in prostitution and exploitation.
- Prostitution sits in the female offender and VAWG Strategies and there needs to be join up between the two pieces of work.

Current provision in London

A number of organisations in London support women involved in prostitution, but consultation participants identified a lack of investment in services to do this work effectively and noted the likelihood that the true extent of women's involvement in prostitution is probably much greater than we realise and there is likely to be significant unmet need.

Opportunities, challenges and next steps

Further work is needed, in consultation with expert partners, to identify how all partner agencies can work together to ensure that opportunities are taken at every stage to support women who are involved in prostitution and to ensure that this is taken into account in decisions throughout the criminal justice process. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

Advance
Nia

Women at the Well
Women in Prison

Recall

Recall

Before the Offender Rehabilitation Act 2014 (ORA), those serving a fixed term sentence of under 12 months were released unconditionally at the halfway point in their sentence. ORA changed this by introducing a requirement for anyone serving a sentence of more than one day but less than 12 months who is aged 18 or above at the halfway point in their sentence, to be released at that point on licence rather than unconditionally. This means, for example, that someone receiving a custodial sentence of six months will be released at three months and spend the remaining three months on licence in the community.⁷⁹ During their licence period they will be supervised and subject to certain conditions. Someone who breaches the conditions of their licence may be recalled to custody without a further court appearance. This process is known as 'recall'.

Breach of post-sentence supervision requirements

The Act also introduced a period of post-sentence supervision for those sentenced to less than two years imprisonment, which begins at the end of the sentence and ends on the expiry of 12 months from the date of release. This means that the person serves half of their custodial sentence in custody and the second half under licence in the community, followed by a post-sentence supervision period lasting until the person has spent 12 months in the community since their release.⁸⁰ Someone who fails to comply with the requirements of their post-sentence supervision can face court proceedings for breach which could result in imprisonment or another outcome. This process is known as 'breach of post-sentence supervision requirements' and is distinct from recall.

⁷⁹ Offender Rehabilitation Act 2014, Explanatory Notes

⁸⁰ Ibid

Increase in recall rates

Following the introduction of the new requirements under ORA there was a significant rise in recall to prison for both men and women; however, the percentage increase was greater for women. More women than ever before are being recalled to prison following their release. In 2017, 1,651 women were recalled to custody (over half were on prison sentences of under 12 months). This has been a year-on-year increase, with 1,378 women recalled in 2016 and 1,155 in 2015.⁸¹ The 2016 Inspectorate report of HMP Bronzefield found that nearly 10% of women were there on recall and that many did not understand their licence conditions.⁸² Since the initial rise in recall for men, the recall rate began to decrease again and has now stabilised, whereas for women the rate of recall continues to rise.⁸³

Reasons for the rise

The rise in recall may be attributed in part to the changes made by ORA. As the majority of women receive short custodial sentences, they have been disproportionately affected by the implementation of mandatory supervision for those sentenced to 12 months or less, as has been acknowledged by the government⁸⁴. Women on these short sentences account for the largest proportion of women's recalls. Before the changes, those women would have been released unconditionally, would not have been subject to supervision post-release and therefore could not have been recalled to prison.⁸⁵

There is also a potential challenge for CRCs who are responsible for supervising those on short sentences, in striking the right balance between enforcement and rehabilitation and avoiding community supervision requirements becoming a revolving door back into custody. London CRC is committed to keeping recall practices under review and to ensuring wherever possible that women are supported to comply with their requirements. A small qualitative study on the underlying causes of recall has recently been published by the Prison Reform Trust which finds that trust between women and their probation workers is key in ensuring successful rehabilitation and avoiding recall.⁸⁶

Consultation feedback

- The same level of service commitment that is being asked for in pre-sentence reporting should be replicated in recall.
- There needs to be more communication between women and their probation officer, so that they fully understand their licence conditions; if they are recalled they need to understand why. It needs to be better explained to the women at the beginning of their licence.
- There needs to be a better understanding of the purpose of a 14 day or 28-day recall, as that length of time in prison is not going to change anything.
- The recall process should show that all alternatives have been considered prior to recalling a woman and that recall is definitely a last resort.

⁸¹ Ministry of Justice (2018) Table 5.2 Number of offenders recalled from licence, by sex, supervising body, and sentence length. Offender Management Statistics quarterly: October to December 2017, London: MoJ

⁸² HM Inspectorate of Prisons (2016) HMP & YOI Bronzefield: 9 -20 November 2015, London: HMIP

⁸³ Guiney, T. (2018) Why Are More Women Being Returned to Prison Than Ever Before? Huffington Post. 13 February. Available from: https://www.huffingtonpost.co.uk/entry/why-are-more-women-being-returned-to-prison-than-uk_5a81bca5e4b033149e401d62 [accessed 21 March 2018].

⁸⁴ Oral supplementary question by Baroness Burt of Solihull, 31 January 2019: <https://hansard.parliament.uk/lords/2019-01-31/debates/ABD60075-464A-483E-B01D-E47DB341C1B8/Debate>

⁸⁵ Guiney, T. (2018) Why Are More Women Being Returned to Prison Than Ever Before? Huffington Post. 13 February. Available from: https://www.huffingtonpost.co.uk/entry/why-are-more-women-being-returned-to-prison-than-uk_5a81bca5e4b033149e401d62 [accessed 21 March 2018].

⁸⁶ Prison Reform Trust (2018) Broken Trust, London: PRT

- There needs to be increased communication between the CRC workers and the responsible officer, so that they are able to update each other on women's progress. Levels of positive engagement should be shared so that the probation officer is aware if a woman is engaging well with a non-statutory agency. Multi-agency work needs to be improved and a commitment made to do this, even if there is no contract between the CRC and other agencies. This communication is also important to make sure that any work going on in prison does not stop on release, and vice versa.
- The same quality of service and level of consideration that is being requested in the Blueprint at all stages of the criminal justice process must also apply prior to recall.
- There needs to be greater understanding of the process that occurs prior to someone being recalled.
- The NPS and CRC send a recall submission to the Public Protection Casework Section of HMPPS who then have the final decision as to whether or not someone is recalled; this has to be signed off by an area manager prior to submission. Evidence needs to be provided by the CRC/NPS officer to show the steps that have been taken to try and engage with the women before recalling her.
- The NPS/CRC office have a primary responsibility to manage risk to the public; this is their focus when looking at recalling someone.
- The officer has to have the information required to understand the women's behaviour, to assess her compliance and to be able to defend the recall decision.
- There is currently more training being put in place to make sure recall is being used properly and only as a last resort.
- Alternatives to recall include:
 - Changing the sentence plan or changing the sequence of the sentence plan
 - Adding relevant license conditions to the existing licence to manage the risk posed
 - Engaging other services
 - Increasing contact and appointments
 - Considering whether there should be a MARAC or IOM referral
 - Making a home visit
 - Taking account of the woman's social capital such as family and other support.

Opportunities, challenges and next steps

Further work is needed, in consultation with expert partners, to identify how all partner agencies can work together to identify the drivers to recall, to ensure that recall is avoided wherever possible and to monitor progress. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

Advance
London CRC

NPS – London
Women in Prison

Trafficked women (See also **Exploitation and Gangs, Foreign National Women and Prostitution**)

Evidence of need

Human trafficking is defined in international law as the illegal trade in human beings for the purposes of commercial sexual exploitation or forced labour. It is a form of modern slavery and is one of the fastest growing criminal industries in the world. Article 4 of the Council of Europe Convention on Action against Trafficking 2005 (the Trafficking Convention) defines trafficking as involving three things:

- Recruiting, moving or harbouring a person;
- In particular ways, such as by using force, deception, the abuse of power or the abuse of a position of vulnerability;
- For the purpose of exploitation, like forcing someone to be involved in prostitution, forced labour or domestic servitude.

The Modern Slavery Act 2015 encompasses human trafficking for all forms of exploitation. The Act introduced measures to enhance the protection of victims of slavery and trafficking. Victims of trafficking should not be punished for offences that they commit as a result. Yet evidence confirms that victims of modern slavery continue to be prosecuted for crimes they were forced to commit.⁸⁷

Consultation feedback

- It is necessary to define ‘trafficked women’ and if it includes women who are taken to court and then found not guilty. If so, how do we ‘capture’ them and ensure support for women involved in the criminal justice system but not prosecuted or convicted.
- More attention should be given to trafficked women in the Blueprint.
- The difference between smuggling and trafficking needs to be made clear.
- The contract between the Ministry of Justice and London CRC needs to be fleshed out more, so that the specifics around these women and the specific services they need are included in the contractual requirements.
- To identify and ensure women who have been trafficked are not imprisoned there needs to be more and widespread training on trafficking to CJ professionals

Current provision in London

A range of organisations work with women in contact with the criminal justice system in London who are victims of trafficking, including Hibiscus Initiatives and Abianda. This is a growing area of focus and challenge for the Metropolitan Police, the CPS and probation agencies. However, this remains a largely hidden group and there is likely to be significant unmet need.

Opportunities, challenges and next steps

Identifying women who have committed offences in the context of trafficking, and those who are at risk of offending in those circumstances, is a key challenge for all criminal justice agencies and women’s services. There is a significant policy focus on this at national level and the Modern Slavery Act provides a framework for the non-prosecution and protection of victims of trafficking. However, improvements in practice require constant reflection and close joint work between agencies, in consultation with expert partners. It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

Abianda
AIRE Centre
BID UK
Equal
Hibiscus Initiatives
Human Trafficking Foundation
Kalayaan

Lammy Review implementation team
(MoJ)
Nia
Office of the Independent Anti-Slavery
Commissioner
Redthread
St Giles Trust
Women at the Well

⁸⁷ Prison Reform Trust (2018) Still No Way Out: Foreign national women in the criminal justice system, London: PRT

Young women and care leavers (See also **Exploitation and Gangs** and **Trafficked women**)

Evidence of need

Girls (under 18-year olds) are not within the scope of the Blueprint. However, given that the drivers to offending often begin in childhood it makes sense to include some analysis relating to girls in contact with the criminal justice system or at risk of such contact.

Research has shown that children and young people at risk of offending have gender specific vulnerabilities. For instance, young women are more likely to experience sexual violence and abuse⁸⁸, to experience intimate partner violence, and to have mental health concerns which might trigger offending behaviours⁸⁹. Gender is also thought to make a fundamental difference to responses to intervention and engagement in support⁹⁰. Yet it is argued that the population specific needs and approaches relevant to young women are substantially overlooked within research and policy due to their small numbers.⁹¹

Vulnerable young women who face the prospect of locked accommodation typically experience challenges from birth, including a history of care placements, neglect, exploitation, exposure to violence and trauma, and loss.⁹²

As in the general population, looked after girls are significantly less likely than boys to be convicted of an offence. As such, they are a minority group within the criminal justice system and there is a lack of research about their experiences, needs and characteristics.⁹³ Girls in care may be at greater risk of child sexual exploitation than boys and this may be linked to criminalisation.⁹⁴ There appears to be an increased risk of child sexual exploitation where girls are moved between multiple placements or are placed far from home. The risk is also increased for young women leaving care, if they are placed in inappropriate bed and breakfast or hostel accommodation dominated by male residents.

The UN Special Rapporteur on Violence Against Women visited the UK in 2014 and raised concerns over the number of young women who are incarcerated. She called for the

⁸⁸ Roesch-Marsh, A. (2014). Risk assessment and secure accommodation decision making in Scotland: Taking account of gender? *Child Abuse Review*, 23, pp. 214- 226. Cited in Wilson, G. (2015) Re-imagining justice for young women in Scotland: An age and gender informed approach – issue 26, Howard League for Penal Reform's Early Career Academics Network (ECAN) bulletin, published 10 April 2015.

⁸⁹ Bateman, T., & Hazel, N. (2014). Resettlement of girls and young women: Research summary. Beyond Youth Custody. Cited in Wilson, G. (2015) Re-imagining justice for young women in Scotland: An age and gender informed approach – issue 26, Howard League for Penal Reform's Early Career Academics Network (ECAN) bulletin, published 10 April 2015.

⁹⁰ Gelsthorpe, L., and Worrall, A. (2009) 'Looking for trouble: A recent history of girls, young women and youth justice', *Youth Justice*, 9(3), pp. 209–223. Cited in Wilson, G. (2015) Re-imagining justice for young women in Scotland: An age and gender informed approach – issue 26, Howard League for Penal Reform's Early Career Academics Network (ECAN) bulletin, published 10 April 2015.

⁹¹ Wilson, G. (2015) Re-imagining justice for young women in Scotland: An age and gender informed approach – issue 26, Howard League for Penal Reform's Early Career Academics Network (ECAN) bulletin, published 10 April 2015.

⁹² See: McNeish, D., and Scott, S. (2014) *Women and young women at risk: Evidence across the life course*. London: Barrow Cadbury Trust, LankellyChase Foundation, Pilgrim Trust; Wilson, G., and Edgar, C (2014) 'What works for girls and young women: Time for Change'. *Presentation for the Centre for Youth and Criminal Justice*. Vulnerable Girls and Young Women Champion Group. Cited in Wilson, G. (2015) Re-imagining justice for young women in Scotland: An age and gender informed approach – issue 26, Howard League for Penal Reform's Early Career Academics Network (ECAN) bulletin, published 10 April 2015.

⁹³ Staines, J. (2016) Risk, adverse influence and criminalisation: Understanding the over representation of looked after children in the criminal justice system, London: PRT

⁹⁴ Prison Reform Trust (2016) *In Care, Out of Trouble: How the life chances of children in care can be transformed by protecting them from unnecessary involvement in the criminal justice system*, London: PRT

development of “gender-specific sentencing alternatives” and recognition of “women’s histories of victimisation when making decisions about incarceration.”⁹⁵

Although there has been a sustained drop in young people entering the criminal justice system and being sentenced to custody, this decrease has not been felt evenly across ethnic groups. Since 2006, there has been an 84.9% decrease in white girls receiving convictions but only a 73.5% decrease for black girls.⁹⁶

Research by Dr Claire Fitzpatrick has shown that girls are likely to have their welfare needs redefined as risks in a risk-dominated justice system, increasing the likelihood of discrimination, and highlights the neglect of girls in care who come into conflict with the law, arguing that a gender-neutral approach in this area risks further marginalising an already vulnerable population.⁹⁷

Consultation feedback

- The transition from youth offending services to the adult criminal justice system is challenging, with the loss of a multi-agency approach, limited interventions and services tailored to the young adult age group, and less support available.
- This is particularly difficult for young women with a history of trauma who may be even less well developed in maturity than their peers.
- Girls and young women aged 16 to 24 years are the age group at the highest risk of being victims of violence.
- Care experienced women are over represented in the criminal justice system. Young women who are care leavers may have a history of multiple care placements and multiple carers and social workers, creating instability, interrupted access to education and a lack of secure attachments. This, together with the lack of a traditional family network of support around them, can make them highly vulnerable to continued involvement in the criminal justice system.
- Care leavers require multi-agency support with a leading professional. Care leavers meeting statutory criteria have limited but important legal entitlements which should be met by their local authority up to the age of 25 years. It is essential for all professionals working with young women care leavers in the criminal justice system to understand care leaver entitlements, communicate these, and support young women to access their rights. Young women also need to be supported to develop their own independence.
- It is essential for professionals’ language to be non-stigmatising in relation to young women’s experience of care, the criminal justice system and gangs.
- There is very limited specialist provision for young women involved in the criminal justice system. Young women will not always need specialist interventions as compared with older age groups; mixed age groups can be helpful where young women can develop positive relationships with older women. However young women may find it harder to engage with some interventions and one-to-one work is likely to be important, with the quality of one-to-one relationships being paramount.
- Existing resources, such as the HMPPS care leaver champions, should be employed to improve practice.

⁹⁵ United Nations (2015) Report of the Special Rapporteur on violence against women, its causes and consequences, Rashida Manjoo, available from: https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/UNSR_VAW_UK_report_-_19_May_2015.pdf [accessed 26 April 2018]

⁹⁶ Prison Reform Trust (2017) Counted Out: Black, Asian and minority ethnic women in the criminal justice system, London: PRT

⁹⁷ Claire Fitzpatrick, (2017) “What do we know about girls in the care and criminal justice systems?”, Safer Communities, Vol. 16 Issue: 3, pp.134-143, <https://doi.org/10.1108/SC-03-2017-0011>

Current provision in London

There is limited specific provision for young women and care leavers in London. Advance aims to achieve a 70% increase in improved emotional management and wellbeing, and in reporting healthier relationships, in young women aged 15 to 24.

Opportunities, challenges and next steps

Further work is needed, in consultation with expert partners, to identify the specific needs of young women and care leavers in contact with the criminal justice system or at risk of such contact and to establish how all partner agencies can work together to ensure that opportunities are taken at every stage to support young women and care leavers to be diverted from the criminal justice system and into support. This work should be informed by the Department for Education's National Protocol to Reduce the Criminalisation of Looked After Children and Care Leavers.⁹⁸ It is proposed that this should be tabled for discussion at an early stage by the Blueprint Delivery Group in order to identify next steps.

Expert partners

Abianda	Howard League for Penal Reform
Agenda	Local authority Directors of children's services
Become	Redthread
Care Leavers' Association	Transition 2 Adulthood Alliance
Drive Forward Foundation	

⁹⁸ Available at: <https://www.gov.uk/government/publications/national-protocol-on-reducing-criminalisation-of-looked-after-children>

6. Relevant organisations

The following organisations are engaged in the treatment of women in contact with the criminal justice system in London or at risk of such contact or are national centres of expertise in this area. Not all those listed are signatories to the Blueprint.

Government agencies and professional bodies

Association of Directors of Adult Social Services

ADASS is the association of directors of adult social services in England. It is a charity which aims to further the interests of people in need of social care by promoting high standards of social care services and influencing the development of social care legislation and policy.

<https://www.adass.org.uk/home>

Association of Directors of Children's Services

ADCS is an organisation of members who hold leadership roles in children's services departments in local authorities in England. Its members specialise in developing, commissioning and leading the delivery of services to children, young people and their families. This includes education, health, youth, early years and social care services. ADCS works in partnership with other agencies to achieve tailored and joined-up services for children, whatever their identified needs. www.adcs.org.uk/

Association of London Directors of Children's Services (ALDCS)

ALDCS is a pan-London body representing all of London's statutory Directors of Children's Services. It provides strategic leadership which promotes and improves the work boroughs do to offer all children and young people the best start in life, with opportunities and support to achieve their full potential. www.londoncouncils.gov.uk/node/26896

Criminal Bar Association

The Criminal Bar Association exists to represent the views and interests of the practicing members of the Criminal Bar in England and Wales. The CBA is committed to assisting young practitioners to develop and advance their practice and providing information to those aspiring to join the Criminal Bar. www.criminalbar.com/

Criminal Law Solicitors Association

The Criminal Law Solicitors' Association represents criminal law solicitors throughout England and Wales. The association is open to any solicitor, prosecution or defence - and to court clerks, qualified or trainee - involved with, or interested in, the practice of criminal law. The CLSA has around 1,500 members and responds to every significant consultation paper affecting criminal lawyers. www.clsa.co.uk/

Crown Prosecution Service – London

The Crown Prosecution Service (CPS) is the main prosecuting authority in England and Wales. The CPS works in partnership with all agencies in the criminal justice system and works especially closely with the police, although it is independent of them. The CPS in London is separated into two areas: CPS South London and CPS North London. Both the North and South London CPS engage with the diverse communities that they serve in order to ensure that they make London a safer place to live, work and visit. CPS South London has two community panels that work on a pan-London basis – one that focusses specifically on Violence Against Women and Girls (VAWG) and one that has a wider remit and will for instance look at cases involving hate crime. www.cps.gov.uk/london

Department for Education

The Department for Education is responsible for children's services and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England. The DfE is a ministerial department that is supported by 18 agencies and public bodies. The DfE's vision is to provide world-class education, training and care for everyone, whatever their background. It will make sure that everyone has the chance to reach their potential and live a more fulfilled life. It will also create a more productive economy, so that our country is fit for the future.

www.gov.uk/government/organisations/department-for-education

Department for Health and Social Care

The Department for Health and Social Care (DHSC) is a ministerial department supported by 28 agencies and public bodies, including Public Health England and NHS England. It supports ministers in leading the nation's health and social care to help people live more independent, healthier lives for longer.

<https://www.gov.uk/government/organisations/department-of-health-and-social-care>

Department for Work and Pensions

The Department for Work and Pensions (DWP) is responsible for welfare, pensions and child maintenance policy. As the UK's biggest public service department, it administers the State Pension and a range of working age, disability and ill health benefits to around 20 million claimants and customers. The priorities of the DWP are to run an effective welfare system that enables people to achieve financial independence by providing assistance and guidance into employment, increase saving for later life and to create a fair and affordable welfare system which improves the life chances of children.

www.gov.uk/government/organisations/department-for-work-pensions

HM Courts and Tribunals Service

HM Courts and Tribunals Service (HMCTS) is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales and for non-devolved tribunals in Scotland and Northern Ireland. HMCTS works with an independent judiciary to provide a fair, efficient and effective justice system. It administers the work of Magistrates' Courts and the County Courts, Family Courts, Crown Courts and the Royal Courts of Justice. It follows the Ministry of Justice's strategic vision for reform, to create a more effective, less costly and more responsive justice system for the public. www.gov.uk/government/organisations/hm-courts-and-tribunals-service

HMP & YOI Bronzefield

HMP & YOI Bronzefield is a modern, purpose-built prison for women which opened in June 2004. It performs the function of a local prison, accepting prisoners directly from the courts and is run by Sodexo Justice Services. The prison accommodates 572 women and is comprised of four house blocks with approximately 130 women in each. HMP & YOI Bronzefield receives women from courts within its catchment area, including remand and trial adults and young adults; short term sentenced adults up to six months; mothers and babies (up to 18 months); Restricted Status prisoners; life sentenced prisoners and young offenders. www.justice.gov.uk/contacts/prison-finder/bronzefield

HMP Downview

HMP Downview is a women's prison located in Surrey. The prison only holds sentenced adult women, having re-opened as a closed women's prison in 2016. The population is diverse, and the majority of the women are from the London area of the South East of England. www.justice.gov.uk/contacts/prison-finder/downview

HMP Send

HMP Send currently operates as a closed women's Training Prison. It also houses a 20 bed Substance misuse Unit, an 80 bed Resettlement Unit and a Therapeutic Community with a capacity of 40. <http://www.justice.gov.uk/contacts/prison-finder/send>

HM Prisons and Probation Service

HMPPS is an agency made up of Her Majesty's Prison Service, the National Probation Service and a headquarters focussed on creating tools and learning. It works with its partners to carry out the sentences given by the courts either in custody or the community, whilst working to reduce reoffending by rehabilitating the people in its care through education and employment. HMPPS in England and Wales are responsible for running prison and probation services, rehabilitation services for people leaving prison, making sure that support is available to stop people reoffending and managing private sector prisons and services.

<https://www.gov.uk/government/organisations/her-majestys-prison-and-probation-service>

Home Office

The Home Office has a fundamental role in the security and economic prosperity of the United Kingdom. The Home Office is the lead government department for immigration and passports, drugs policy, crime, fire, counter-terrorism and police. It is responsible for reducing and preventing crime and ensuring that people feel safe in their homes and communities. www.gov.uk/government/organisations/home-office

Independent Anti-Slavery Commissioner

The IASC has a UK wide remit to encourage good practice in the prevention, detection, investigation and prosecution of modern slavery offences. The IASC wishes to see an increase in the number of victims of modern slavery that are identified and referred for appropriate support and an increase in the number of prosecutions and convictions of traffickers and slave masters. www.antislaverycommissioner.co.uk/

Judicial College

The Judicial College was established in April 2011 to enable all judicial office holders for whom the Lord Chief Justice (LCJ) and the Senior President of Tribunals (SPT) have statutory responsibility, to be trained by the same organisation. The LCJ and SPT have oversight of the College through the Judicial Executive Board (JEB), which supports them in their leadership, organisation and management roles. The chairman of the College is a member of the JEB and through that body advises and supports the senior judiciary in training issues. From April 2013, the training of all types of coroner and coroners' officers also became part of the Judicial College's responsibilities. The Judicial College is part of the Judicial Office. www.judiciary.uk/about-the-judiciary/training-support/judicial-college/

London Association of Directors of Adult Social Services

The fundamental aim of the London Association of Directors of Adult Social Services is to improve adult social care across London and to identify ways of doing this as cost-effectively as possible. It works with adult social services and other bodies committed to improving the health and wellbeing of Londoners, encouraging collaboration through various networks and focused projects. www.londonadass.org.uk/

London Borough of Lambeth

The London Borough of Lambeth oversees the South London Alliance project, commissioned to deliver a whole system approach for women across six South London authorities; Lambeth, Southwark, Lewisham, Croydon, Sutton and Wandsworth. The London Borough of Lambeth received the funding from MOPAC in July 2018 and the project is commissioned until March 2021. Women in Prison delivers Lambeth's service provision across the six boroughs, working with women who have had involvement with the criminal

justice system or are at risk of coming into contact with the criminal justice system.
www.lambeth.gov.uk

London Community Rehabilitation Company (An MTCNovo company)

London Community Rehabilitation Company (CRC) is the largest of the 21 CRCs in England and Wales, employing nearly 1,200 staff in London. Its role is to manage those offenders assessed as low and medium risk under probation supervision. London CRC works alongside the National Probation Service, which manages offenders who have been assessed as presenting high risk of harm to others.

London CRC's work with women offenders is overseen by the Head of Interventions who reports to the Deputy Director for Custody, Interventions, Contracts and Partnerships. The CRC is currently finalising a draft women offenders' strategy. The strategy has four main priorities:

1. To deliver a comprehensive and effective Women's Through the Gate resettlement service;
2. To provide a safe and secure women's space;
3. To create a trauma informed workforce; and
4. To deliver an evidence-based set of interventions for women across London.

London CRC works with women in all London boroughs and funds women specific support in the following boroughs:

Barking	Hammersmith and	Lewisham
Brent	Fulham	Newham
Camden	Haringey	Redbridge
Croydon	Havering	Southwark
Dagenham	Hillingdon	Waltham Forest
Ealing	Hounslow	Westminster
Enfield	Islington	
Hackney	Kensington and Chelsea	

www.londoncrc.org.uk

London Councils

London Councils is the local government association for Greater London. It is a cross-party organisation that represents London's 32 borough councils and the City of London and works on behalf of all of its member authorities to ensure that they have the resources, freedoms and powers to do the best possible job for their local communities. It was formed in 1995 as a merger of the London Boroughs Association and the Association of London Authorities. London Councils is a signatory to the shared vision for women offenders in London is set out in the MOU 'Working towards justice devolution', which contains commitments to developing a whole systems approach to women offenders in London.

www.londoncouncils.gov.uk

London local authorities

London's local authorities (borough councils) are uniquely placed to work strategically with local and regional stakeholders to ensure the needs of women in their local area are identified and met. Women in contact, or at risk of contact, with the criminal justice system will often be in contact with multiple local services – for example housing, social care services, drug and alcohol treatment, mental health provision. Local authorities, and they perform a central role both in commissioning and providing services and in co-ordinating services locally.

Magistrates' Association

The Magistrates Association (MA) is the independent voice of all magistrates in England and Wales. As the voice of magistrates, the MA works hard to promote the work of its members and the institution of the lay justice system. The MA speaks to key decision-makers in Parliament and Government, as well as the media and other organisations in the criminal justice field. It has an in-house policy team who research key topics relevant to the magistracy as well as monitoring changes in the law to ensure its members are supported. The MA influences key decision-makers provides members with information and training and promotes public awareness of the magistracy. www.magistrates-association.org.uk

The Mayor's Office for Policing and Crime (MOPAC)

MOPAC is responsible for delivering the Mayor's Police and Crime Plan for London, 2017-2021. This work is led by the Deputy Mayor for Policing and Crime. MOPAC has invested just over £5m in women offender services from 2018 to 2021. This includes investment through the Co-Commissioning Fund in two consortiums to deliver services to women across 21 London boroughs. MOPAC is currently preparing to issue a tender for the Metropolitan Police Service's (MPS) planned large scale women offender diversion pilot. In the Memorandum of Understanding (MOU) Working towards justice devolution, MOPAC, MoJ and London Councils set out a shared vision to develop a whole system approach to women offenders in London. Through the development of the Blueprint and the Action Plan, MOPAC aims to work with partners to achieve a permanent strategic change in the way women at risk of imprisonment in London are helped.

<https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac>

Metropolitan Police Service (MPS)

The MPS is the UK's largest police service and has 25% of the total police budget for England and Wales. The Commissioner is accountable in law for exercising police powers and to MOPAC and is held to account for the delivery of policing by the Home Secretary and the Mayor of London. The Mayor of London was given a direct mandate for policing in London in 2011, as part of the Police and Social Responsibility Act. As such, the Mayor is responsible for setting the strategic direction of policing in London through the Police and Crime Plan.

A number of powers are devolved to MOPAC, which is led by the Deputy Mayor for Policing and Crime. This includes the delivery of efficient and effective policing, management of resources and expenditure. MOPAC is the functional body of the Greater London Assembly that sets the policing budget, holds the Commissioner to account and in partnership discusses progress against the Police & Crime Plan, assesses the strategic budget position and key risks to delivery. www.met.police.uk

Ministry of Housing, Communities and Local Government

Formerly the Department for Communities and Local Government, the Ministry's job is to create great places to live and work, and to give more power to local people to shape what happens in their area. The Ministry of Housing, Communities and Local Government is responsible for driving up housing supply, increasing home ownership, devolving powers and budgets to boost local growth in England and supporting strong communities with excellent public services. www.gov.uk/government/organisations/ministry-of-housing-communities-and-local-government

Ministry of Justice

The Ministry of Justice is the UK government department with responsibility for courts, prisons, probation services and attendance centres. Its work on women offenders is led by the Parliamentary Under Secretary of State, a role currently held by Edward Argar MP. Officials in the Vulnerable Offender team are responsible for policy in relation to women offenders. The Ministry of Justice published a national Female Offender Strategy in June 2018. The Ministry of Justice's shared vision with MOPAC and London Councils to develop a whole system approach to women offenders in London is set out in the MOU 'Working towards justice devolution'. <https://www.gov.uk/government/organisations/ministry-of-justice>

National Police Chiefs Council (NPCC)

The NPCC brings police forces in the UK together to help policing coordinate operations, reform, improve and provide value for money. Crime is changing and so are citizens' needs and expectations of policing. They are constantly adapting and reforming to keep people safe. Public confidence and support are essential. The NPCC strive to improve the way they work and learn from when things go wrong to build people's confidence in the police. www.npcc.police.uk/Home.aspx

National Probation Service (London)

The National Probation Service (NPS) London is currently one of seven NPS Divisions (England and Wales). Its priority is to protect the public by the effective rehabilitation of high risk of harm offenders, by tackling the causes of offending and enabling offenders to turn their lives around. The NPS is also responsible for preparing pre-sentence reports for Courts, to assist them with selecting the most appropriate sentence. The NPS works with offenders in prison to prepare them for release in accordance with the conditions of their licence and manages the Approved Premises (AP) estate for those high-risk offenders requiring AP residence. The NPS also has an important role in communicating and prioritising the wellbeing of victims of serious sexual and violent offences where the offender has received a prison sentence of 12 months or more.

NPS London supervises between 600-700 women, around half of whom are in custody at any one time. Its Women Offender's Board and Divisional Plan is led by the Head of Stakeholder Engagement and implemented by the Women's Strategy Lead. NPS London's priority is to reduce the use of short-term custody for women in London. It works in partnership with London CRC and the MOPAC co-commissioned services, as well as liaison and diversion providers and other voluntary and community sector organisations to ensure NPS women can access a trauma informed service. NPS London also delivers the women's personality disordered pathway service in conjunction with NHS England. <https://www.gov.uk/government/organisations/national-probation-service>

NHS England (London)

NHS England (London) has oversight and leadership for the NHS in London and commissions more than £15 billion of services for the 8.17 million people living in the capital. These include general practitioners (GPs) and over 140 specialised services. This also consists of Healthcare for those in the criminal justice system such as Prisons, Liaison and Diversion services, Sexual Assault and Abuse services, and Immigration and Removal Centres.

NHS England (London) is working with partners to implement the Ministry of Justice national Female Offender Strategy from 2018 with the aim to update the London Strategy.

The Health in Justice and Other Vulnerable Adults London Clinical Network (HiJOVA) has an overarching aim to provide expert advice to NHS England (London) Health in Justice and Other Vulnerable Adults Commissioning Stream to improve vulnerable Londoners' wellbeing in their contact with the criminal justice system. HiJOVA developed a proposed strategy in

2016 which was partly adopted and will be updated in light of the government's Female Offender Strategy. <https://www.england.nhs.uk/>

Public Health England

Public Health England exists to protect and improve the nation's health and wellbeing and reduce health inequalities. It is an executive agency of the Department of Health and Social Care, and a distinct organisation with operational autonomy. It provides government, local government, the NHS, Parliament, industry and the public with evidence-based professional, scientific expertise and support. www.gov.uk/government/organisations/public-health-england

London Health and Wellbeing Boards

Health and Wellbeing Boards bring together key leaders from the local health and care system to improve the health and wellbeing of their population and reduce health inequalities. The boards should achieve this through developing shared understandings of the health and wellbeing needs of its communities, providing system leadership, having strategic influence over commissioning decisions across health, public health and social care and by involving councillors and patient representatives in commissioning decisions. www.londoncouncils.gov.uk/our-key-themes/health-and-adult-services/health/health-and-wellbeing-boards

London CCGs

Clinical Commissioning Groups are clinically-led statutory NHS bodies. The CCG is responsible for the planning and commissioning of health care services in its local area. Commissioning is about getting the best possible health outcomes for a local population, which involves assessing needs, deciding priorities and strategies and then buying services on behalf of the population. CCGs are responsible for the health of its population and must constantly respond and adapt to changing circumstances. www.england.nhs.uk/ccgs

Voluntary sector agencies

Abianda

Abianda is a social enterprise that works with young women who have been affected by gangs and provides training for professionals who work with them. Abianda provide frontline services for girls and young women aged 11 to 24 years, along with training for social workers, youth workers, police, health professionals, foster care and others. Abianda uses a unique model of practice and address the barriers that stop young women seeking help, working alongside them to design and deliver services. www.abianda.com

Advance

Advance, founded in 1998, is an award-winning innovative charity, enabling women and girls to lead safe and violence-free lives, so that they are able to actively engage with society. It is a women-only organisation delivering services for women by women, supporting those experiencing domestic violence to be safe and take back control of their lives, and helping those who have committed crime to break the cycle of reoffending and keep families together.

Based in London, since its inception Advance has led the way in innovation in the sector with community, "through-the-gate", and whole-system co-located services. Through its women's centres and advocates, Advance delivers holistic, specialist one-to-one support and engaging group interventions tailored to women's needs. Advance evokes change by working within the system, engaging with professionals through advocacy and training to improve outcomes for women across London. www.advancecharity.org.uk

Agenda

Agenda was brought together by a group of trusts, foundations and voluntary sector organisations building on work started with Baroness Corston's 2007 report into women in the criminal justice system. Agenda was brought together in 2015 to advocate for change for women and girls at risk. They exist to ensure that women and girls at risk of abuse, poverty, poor mental health, addiction and homelessness get the support and protection they need. Agenda campaign for systems and services to be transformed. Raising awareness across sectors to promote public and political understanding of the lives of women and girls who face multiple disadvantages. www.weareagenda.org/

Airnetwork

Airnetwork provides services for disadvantaged adults and young people across London, Essex and Kent. The services focus on issues such as problematic substance use, crime and offending behaviour, homelessness and employability. Airnetwork supports individuals' move through a successful recovery, developing their quality and enjoyment of life, supporting them in developing life skills and in making life choices as they move towards employment and independent living. www.connectsport.co.uk/organisation/air-network.

Become

Become deliver support and advice to children in care and young care leavers. They run services including their Care Advice Line and life coaching programme. Become also help the care system work better by ensuring that young people's voices and perspectives shape policy and practice. They engage with young people by helping them create their own campaigns and link them directly with decisions made locally and in Westminster. www.becomecharity.org.uk.

Care Leavers' Association

The Care Leavers' Association is a national user led charity based in Manchester which aims at improving the lives of care leavers of all ages. It brings together the voices and experiences of care leavers to support other care leavers, improve the current care system and change society's perceptions. The Care Leavers' Association have a Criminal Justice Project which works to reduce the number of care leavers in the criminal justice system and to improve the support to care leavers in the criminal justice system and institutional practice. www.careleavers.com

Catch-22

Catch22 is a not for profit social business delivering services for young people, families and adults. They work with individuals across justice, social action, education and into employment. Catch22 deliver alternative education, apprenticeships and employability programmes, justice and rehabilitation services (in prisons and in the community), gangs intervention work, emotional wellbeing and substance misuse, and children's social care programmes. www.catch-22.org.uk

Clean Break

Clean Break is a women's theatre company delivering theatre-based courses, awarding qualifications and offering specialist support for women who have experience of the criminal justice system. Clean Break run programmes in women's prisons and at their women-only premises in London. The training and education programme can help participants to develop personal, professional and creative skills that can often lead to education and employment. www.cleanbreak.org.uk.

Clinks

Clinks is the infrastructure organisation supporting voluntary organisations in the criminal justice system in England and Wales. Our aim is to ensure that organisations and the people

they support are informed and engaged in order to transform lives and communities. Clinks support, promote and represent the [voluntary sector working with people in the criminal justice system](#) and their families, there are currently over 1,700 voluntary organisations working in England and Wales. Clinks keep members up-to-date with the fast-changing criminal justice landscape, ensuring they can respond to new developments and opportunities, as well as advocating for change on policy issues raised by members. Clinks believe there are key actions that can be taken, across sectors, to ensure that people in the criminal justice system get the support they need to change their lives for the better. Find out more in [Influencing criminal justice policy](#). www.clinks.org

Drive Forward Foundation

Drive Forward provides support to young care leavers and aims to make a difference to their lives by helping them achieve their career goals and succeed in life. Drive Forward create opportunities for care-experienced young people, following a relational working approach based on trust and understanding to create a connection with the individual to better understand their needs, desires and aspirations. Drive Forward runs employment consultations to identify suitable training and job opportunities that match an individual's life and career plan. www.driveforwardfoundation.com

Heart & Mind

Heart & Mind is a team of over 40 health care practitioners who work together to offer Short and Long-Term Psychotherapy and Counselling, Cognitive-Behavioural Therapy (CBT) and Life Coaching. It provides help and support on a range of issues including relationship difficulties, depression, anxiety, panic attacks, addiction, sexual problems, bereavement, faith issues, work and life balance and personal development. Heart & Mind offers professionally accredited counselling training programmes underpinned by a Christian worldview.

www.heartandmind.london/#welcometoheartandmind

Hibiscus

Hibiscus Initiatives is a voluntary organisation that has been delivering high-quality services for over 30 years. Hibiscus provides expert support, working with foreign national and black, minority ethnic and refugee women in prison, in the community and in immigration detention. Hibiscus has a person-centred approach which engages the clients, supporting and empowering them to deal with their multiple and often complex needs whilst addressing the disadvantage that language and cultural barriers present. www.hibiscusinitiatives.org.uk

Housing for Women

Housing for Women provides and promotes affordable homes for women and provides gender-specific support services. For over 40 years Housing for Women has supported women and children in London to escape domestic abuse, empowering women to overcome trauma and rebuild their lives without fear. Housing for Women owns and manages over 920 properties across 10 London boroughs. www.hfw.org.uk

Imkaan

Imkaan is a Black feminist organisation dedicated to addressing violence against Black and minoritised women and girls. Imkaan works with members to represent the expertise and perspectives of frontline, specialist and dedicated Black and minoritised women's organisations that work to prevent and respond to violence against women and girls, including domestic violence, forced marriage and 'honour-based' violence. Imkaan delivers a package of support to frontline Black and minoritised organisations, including quality assurance, accredited training and peer educational sustainability support and facilitation of space for community engagement and development. Imkaan conducts research to support the ongoing development of a robust evidence base around the needs and aspirations of Black and minoritised women and girls. www.imkaan.org.uk

Inspirit

Inspirit Training & Development Ltd is an ex-service user led organisation that primarily works to support alcohol and drug users and their families through educational opportunities, personal development and consultation for service user involvement. Inspirit delivers services and runs a 'freespace' for creative and personal development. Inspirit coordinates service user involvement in the London Borough of Islington (substance misuse services) and is responsible for developing a pioneering co-production process for NHS England, London Region, in healthcare in the London prison estate and other criminal justice settings. www.inspirit-training.org.uk

Pecan

Pecan is a Christian charity dedicated to bringing hope to individuals and the wider community. Pecan helps people facing barriers to find a way through and believes that, with the right support, people can unlock their true potential. Pecan has two women's spaces, which are one-stop-shops for women affected by the criminal justice system and for local women seeking support, information and community. The aim of the centres is to provide gender-specific and personalised support. Pecan works with the London CRC and other partner organisations and services, to allow women to access a holistic range of support. www.pecan.org.uk

Prison Reform Trust

The Prison Reform Trust is an independent UK charity working to create a just, humane and effective penal system. This is done by inquiring into the workings of the system, informing prisoners, staff and the wider public; and by influencing Parliament, government and officials towards reform. PRT have a longstanding interest in improving criminal justice outcomes for women. The Transforming Lives programme has a specific aim to reduce the unnecessary imprisonment of women. www.prisonreformtrust.org.uk

Redthread

Redthread is a collaborative youth work charity with 20 years' experience in delivering dynamic and holistic support to young people in their personal and social development. Their mission is to empower young people to thrive as they navigate the challenging transition to adulthood by integrating trauma-informed youth work into the health sector. www.redthread.org.uk

Refuge

Refuge aims to empower women and children to rebuild their lives, free from violence and fear. It provides a range of life-saving and life-changing services, and a voice for the voiceless. Refuge understands that everyone's circumstances and needs are different, and that survivors need different services at different times. Its staff work closely with every individual to develop a bespoke plan. Refuge runs award-winning national campaigns to challenge the negative myths surrounding domestic violence and reaches out to abused women and children to break their isolation and help them access support. www.refuge.org.uk

SafeGround

Safe Ground work to reduce the risk of offending and reoffending based on a continually developing understanding of the origins and impact of crime and a commitment to empowering people to change. Through drama, dialogue, and debate they enhance empathy and encourage expression, developing self-awareness and promoting social justice. www.safeground.org.uk

Safer London

Safer London delivers a range of prevention, diversion and intervention projects for young Londoners involved in gangs and youth crime, especially the victims of gang crime and those looking to make a positive transition to crime-free lives.

Safer London has three key programmes: Empower - a multi-strand holistic framework to tackle gang-related sexual exploitation in priority London boroughs; Aspire - a pan-London 1:1 skills development programme supporting young people aged 16-25, predominantly ex-offenders or those on the margins of criminality; and Safe & Secure – an intensive high-level gang exit, relocation and life-transformational programme. www.saferlondon.org.uk

Startup

Startup is committed to reducing reoffending and improving life chances for ex-offenders and disadvantaged young women by giving them the opportunity to turn their lives around and earn a successful living. They provide focused, caring and consistent support, both financial and personal, that will reduce reoffending by enabling ex-offenders to become self-employed. They work with women whilst still in prison and continue to support them for at least a year once they have become self-employed. The Startup model has been developed with ex-offenders and offenders directly contributing ideas, helping plan services and developing a peer network of support. www.startupnow.org.uk/

St Giles Trust

St Giles Trust aims to help break the cycle of prison, crime and disadvantage and create safer communities by supporting people to change their lives. Its services put reformed ex-offenders at the heart of the solution, training them to use their skills and first-hand experience to help others through peer-led support. St Giles Trust works in custody, through the gate and in the community, finding solutions to support offenders to break the cycle and move towards social inclusion and mainstream provision. It works with a wide demographic and has specific experience with groups including women, BAME people, young people and foreign national prisoners. www.stgilestrust.org.uk

T2A

T2A (Transition to Adulthood) is an initiative of the Barrow Cadbury Trust's criminal justice programme. The framework for T2A's work is the 'T2A Pathway', 10 points in the criminal justice system where a distinct approach to young adults can be delivered. The T2A programme makes the case that developmental maturity is a better guide than age when deciding on the best response to offending by young adults. When policy makers, sentencers, and practitioners take into account developmental maturity and the particular needs of this group, research has shown that young adults are more likely to 'grow out of crime'. Choosing an appropriate intervention at this stage can reduce the time young offenders spend in the criminal justice system. www.t2a.org.uk

Turning Point

Turning point offer a wide range of health and wellbeing services. They support individuals with a learning disability and complex needs, mental health support, support for individuals with alcohol and drug misuse issues and for those who want to improve their emotional and physical health. www.turning-point.co.uk/

Women at the Well

Women at the Well are a women-only service located in Kings Cross dedicated to supporting women whose lives are affected by or at risk of being affected by prostitution. Most women who use their services have multiple and complex needs including: problematic drug and alcohol use, mental health difficulties, rough sleeping and trafficking. www.watw.org.uk/

Women in Prison

Women in Prison (WIP) is a unique, women-only organisation that provides gender-specialist support to women affected by the criminal justice system and campaigns to expose the injustice and damage caused to women by imprisonment. It campaigns for a radical reduction in prison places in favour of community solutions and wants to see considerable investments in community alternatives to custody such as women's centres.

WIP works in prisons, in the community and "through the gate", supporting women leaving prison. It runs three women's centres that all incorporate liaison and diversion schemes for women involved in the criminal justice system. WIP's combined services provide women with support around advocacy, complex needs, domestic and sexual violence, education, training and employment, housing, mental health, parenting and substance misuse.

<https://www.womeninprison.org.uk/>

Women's Aid

Women's Aid is a national charity working to end domestic abuse against women and children. It is a federation of over 180 organisations across England. Local Women's Aid organisations may include freephone 24 hour domestic violence helplines, online support, refuge accommodation, outreach services, independent domestic violence advocacy, floating support and aftercare and resettlement. www.womensaid.org.uk

Working Chance

Working Chance started from small beginnings in 2007 and have grown to be a respected and dynamic not-for-profit recruitment consultancy who make real and lasting changes in the lives of women who have had contact with the criminal justice system, their children and the community more broadly. Their mission is to help candidates to become financially independent by preparing them to re-enter the labour market and enabling them to obtain and sustain quality, paid employment which offers real career prospects. Unlike commercial recruitment consultancies, they offer career coaching and advice, employability skills training, and in-work mentoring to encourage career development. Working Chance also provide resettlement support and specialist interventions in times of crisis to ensure that their candidates can successfully re-establish themselves within mainstream society, transition into paid employment and thrive in their chosen careers. www.workingchance.org/

Young Mums Support Network

YMSN is a registered social enterprise offering support to single and young mothers. YMSN provides support, training and development to young mothers in deprived areas. It aims to empower young women to make informed decisions about their lifestyle and relationships, offering coaching and helping young mothers reach their personal goals. It offers access to educational support, mediation and counselling services as well as wider access to skills and employment. YMSN runs three programs: Ready Steady Work, Ladies Lunch and Information Coffee Mornings. Additional services include advice on sexual health, healthy relationships, parental workshops and victim support. It also provides a pathway to free training courses to young women through partnerships with local communities and charities. www.ymsn.co.uk

Leaders'

London Councils' Urgency Report

Item no: 8

Report by: Lisa Dominic **Job title:** Governance Support Officer
Date: 4 June 2019
Contact Officer: Christiane Jenkins
Telephone: 020 7934 9540 **Email:** Christiane.jenkins@londoncouncils.gov.uk

Summary	London Councils' urgency procedure was used to approve the London Leadership Programme (LLP): LGA Funding.
Recommendation	Leaders are asked to note the decision taken under the urgency procedure.

London Councils' Urgency Report

Introduction

1. The London Leadership Programme (LLP) supplements the management development that is already offered across individual London local authorities. The programme has been running since the Autumn of 2017 and, through a pilot and four cohorts, 150 London borough senior managers will have been/be offered the high-level, intensive development opportunity.
2. The programme has been funded by LGA grant (two tranches of £100,000 received to date) and participants' fees. A further £100,000 for the next two years (financial years 2019-20 and 2020-21) has been made available by the LGA to support the delivery of the programme. There is no expectation or requirement that this funding is matched by London Councils.

Reason for Urgency

3. The additional money identified by the LGA to support the LLP had to be allocated by the end of March 2019 and as such its availability was time limited. In order to secure the benefits of this funding for all London local authorities an urgent decision needed to be made. As the cumulative funding over time was more than £250,000, this was a decision for London Councils' Elected Officers in line with London Councils Financial Regulations.
4. Elected Officers were requested to support the receipt of grant for the delivery of the LLP and any future related programmes through appropriate grant agreements under the Urgency Procedure.
5. Elected Officers of Leaders' Committee were asked to agree the London Councils submission by midday on Monday 25th March 2019. The Urgency was approved.

Recommendation:

Leaders are asked to note the decision taken under the urgency procedure.

Equalities Implications:

Increasing the diversity of senior, managerial leaders across London local authorities is a key deliverable of the programme.

Financial Implications:

The Director of Corporate Resources reported that acceptance of the third tranche of funding and continuation of the programme is at nil cost to London Councils.

Legal Implications:

There are no Legal implications arising from the contents of this report.

Background paper: The Urgency Report on the London Leadership Programme (LLP): LGA Funding.

Leaders' Committee

Minutes and Summaries

Item no: 9

Report by: Lisa Dominic **Job title:** Senior Governance Support Officer
Date: 4th June 2019
Contact Officer: Christiane Jenkins
Telephone: 020 7934 9540 **Email:** Christiane.jenkins@londoncouncils.gov.uk

Summary Summaries of the minutes of London Councils

Recommendations Leader's Committee is recommended to note the attached minutes:

- TEC Executive – 7 February 2019
- YPES – 28 February 2019
- Grants – 20 March 2019
- TEC – 21 March 2019
- Audit Committee – 21 March 2019

Leaders' Committee

Report from the TEC Executive Sub Committee – 7 February 2019

Item no:

Report by: Alan Edwards **Job title:** Governance Manager
Date: 4 June 2019
Contact Officer: Alan Edwards
Telephone: 020 7934 9911 **Email:** Alan.e@londoncouncils.gov.uk

Summary: Summary of the minutes of the London Councils' TEC Executive Sub Committee held on 7 February 2019.

Recommendations: For information.

1. Attendance: Cllr Huntington-Thresher (LB Bromley), Cllr Daniel Anderson (LB Enfield), Cllr Denise Scott-McDonald (RB Greenwich), Cllr Feryal Demirci (LB Hackney – Acting Chair), Cllr Claudia Webbe (LB Islington), Cllr Manuel Abellan (LB Sutton), Cllr Richard Field (LB Wandsworth) and Cllr Tim Mitchell (City of Wandsworth).

2. Apologies for Absence

Apologies for absence had been received from Cllr Julian Bell (LB Ealing), Cllr Zulfiqar Ali (LB Newham), and Christopher Hayward (City of London).

3. Update on the Ultra Low Emission Zone (ULEZ) – Shirley Rodrigues, Deputy Mayor for Environment and Energy, GLA

Shirley Rodrigues, Deputy Mayor for Environment and Energy, GLA, introduced the item and made the following comments:

- Up to 9,000 premature deaths in London a year are caused by poor air quality in London. This had a big impact, especially on vulnerable groups.
- Poor air quality was an environmental health and social injustice issue.
- The Mayor had brought forward the ULEZ in order to tackle diesel polluting vehicles, which makes up 40% of all air pollution in London.
- ULEZ starts on 8 April 2019 and will operate in the existing central London Congestion Charge Zone and will operate 24 hours a day.

The Committee: **(i)** agreed that Shirley Rodrigues would take back the issue to the GLA of converting borough winter vehicles (eg salt carriers) to make them EU air quality compliant, **(ii)** agreed that Shirley Rodrigues would let Cllr Scott McDonald have a list of where the 453 primary school that exceeded legal air quality limits were located, and **(iii)** noted that boroughs could contact Shirley Rodrigues should they have any queries regarding the upcoming ULEZ

4. Air Quality Update

The TEC Executive Sub Committee received a report that provided an update on London Councils' activities on air quality policy, specifically regarding officers' work on achieving and influencing new clean

air legislation on London Councils' draft response to the Environment, Food and Rural Affairs (Efra) Select Committee inquiry into the draft Environment (Principles and Governance) Bill.

Owain Mortimer, Principal Policy and Projects Officer, London Councils, introduced the report which highlighted what work London Councils was carrying out with regards to air quality. Councillor Demirci informed members that these issues had been discussed at previous TEC meetings and officers were asked to discuss these issues in their boroughs.

Owain Mortimer made the following comments:

- At the TEC meeting in June 2018, members had agreed to support a new Clean Air Act.
- London Councils had compiled a draft consultation response to the Efra Select Committee inquiry that scrutinised the draft Environment (Principles and Governance) Bill to the Secretary of State.
- A number of workshops have been held with borough officers and the GLA, and a number of proposals have been put forward.
- Further details would be made available at a later TEC meeting

The TEC Executive Sub Committee: **(i)** agreed the approach to influencing new clean air legislation, and **(ii)** agreed the response to the Efra Select Committee inquiry.

5. Future Mobility Agenda

The TEC Executive Sub Committee received a report on the time limited work undertaken by the Task and Finish Group on car clubs. The London Councils' TEC Executive Sub Committee was well-placed to play a stronger role in understanding the complexities of the Car Club industry in the Capital and to help shape this policy agenda going forward.

Paulius Macklea, Principal Policy and Project Officer, London Councils, introduced the report and made the following comments:

- One of the aims was to bring key stakeholders together.
- Eight meetings were due to take place over a five month period. Work of the Task and Finish Group on Car Clubs should be finalised by Autumn 2019.
- CoMoUK and the British Vehicle Rental and Leasing Association (BVRLA) would be invited to be regular members of the Group, along with London Councils, boroughs, TfL and the GLA.
- The timeline for the Task and Finish Group was approximately February to July 2019. Meetings were scheduled to take place on Wednesday mornings at the offices of London Councils. A final report was due to go to the TEC Executive Sub Committee meeting on 12 September 2019.

The TEC Executive Sub Committee agreed the purpose, topics, size, composition and timescales of the Task and Finish Group on Car Clubs.

6. Transport & Mobility Services Performance Information.

The TEC Executive Sub Committee considered a report that detailed the London Councils' Transport and Mobility Services performance information for Quarter 3 in 2018/19

The TEC Executive Sub Committee: **(i)** noted that customer satisfaction data would be included in the performance data for the TEC Executive on 18 July 2019, and **(ii)** noted that the performance stats for Taxicard "advanced bookings" figures would be worse in the next quarter due to a number of reasons (new fixed prices from 1st January 2019 that Black Cabs no longer want to take part in/loss of 20% of Black Cab drivers etc).

7. TEC Month 9 Revenue Forecast 2018/19

The TEC Executive Sub Committee received a paper that outlined actual income and expenditure against the approved budget to the end of December 2018 for TEC and provided a forecast outturn for 2018/19.

The TEC Executive Sub Committee: **(i)** noted the projected surplus of £1,411,000 for the year, plus the forecast net underspend of £1,627,000 for overall Taxicard trips; and **(ii)** noted the projected level of Committee reserves, as detailed in paragraph 5 of the report, and the commentary on the financial position of the Committee included in paragraphs 6-8.

8. Minutes of the TEC Executive Sub Committee held on 15 November 2018

The minutes of the TEC Executive Sub Committee held on 15 November were agreed as an accurate record.

9. Minutes of the Main Meeting held on 6 December 2018 (for noting)

The minutes of the TEC Main Meeting held on 6 December 2018 were noted.

The meeting finished at 11:25 am.

Young People's Education and Skills Board

Date	28 March 2019	Venue	London Councils
Meeting Chair	Gail Tolley, Vice Chair		
Contact Officer	Anna-Maria Volpicelli		
Telephone	020 7934 9779	Email	Anna-maria.volpicelli@londoncouncils.gov.uk

Present

Gail Tolley (Chair)	Association of London Directors of Children's Services (ALDCS)
Derek Harvey	Department for Work and Pensions (DWP)
Dr Graeme Atherton	AccessHE
John Prior	Association of Colleges (AoC) /NATSPEC (for Dr Caroline Allen OBE)
Laraine Smith	AoC/Further Education College representative
Mary Vine-Morris	AoC London Region
Sarah Wilkins	Greater London Authority (GLA) (for Joanne McCartney)
Yolande Burgess	London Councils Young People's Education and Skills

Speakers

Phil Rossiter	MIME Consulting
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Officers

Anna-Maria Volpicelli	London Councils Young People's Education and Skills
Peter O'Brien	London Councils Young People's Education and Skills
Spike van der Vliet-Firth	London Councils Economic Development, Skills and Culture

Apologies

Arwel Jones	Association of School and College Leaders
Ben Anderson	London Economic Action Partnership
Dr Caroline Allen OBE	Association of Colleges/NATSPEC
David Jeffrey	Department for Education
Doniya Soni	Greater London Authority (London Economic Action Partnership)
Cllr Georgia Gould (Chair)	London Councils Shadow Executive member (Labour)
Jane Hickie	Association of Employment and Learning Providers
Cllr Nickie Aiken	London Councils Executive Member (Conservative)
Paul Wakeling	AoC/Sixth Form Colleges
Tim Shields	Chief Executives London Committee

1 Welcome, Introductions and apologies

- 1.1 The Chair welcomed members and noted apologies.

2 Declarations of interest

- 2.1 There were no declarations of interest.

3 Minutes of previous meeting and actions arising

- 3.1 The notes of the previous meeting were agreed. The [Post-16 Special Educational Needs and Disabilities Review](#) discussed at the last meeting was published today.

4 Post-16 Education Trajectories Review

- 4.1 The findings from the London Post 16 Education Trajectories Review, a project jointly commissioned by London Councils and the GLA and undertaken by MIME Consulting and University College London Institute of Education, were presented.

Actions: Key points of the discussion to be taken to the Project steering Group; the final report to be presented to the next Board meeting.

5 Updates

Performance Update: Participation, Achievement and Progression

- 5.1 The paper provided an update on the levels of participation of young Londoners in education and training, the level of their achievement and progression at the end of the learning process.

Policy

- 5.2 A draft response to the DfE's consultation on Level 2 and Level 3 qualifications will be provided to the next Board meeting; the DfE had sent a grant determination letter to the GLA setting out the Adult Education Budget for 2019 to 2020. There is concern around the diminishing funding for apprenticeships and how this was changing providers' practices.

Action: A draft response to the consultation on Level 2 and Level 3 qualifications to be considered at the next Board meeting.

London Ambitions (verbal update)

- 5.3 From 1 April users of the London Ambitions portal are being directed to a national system. Careers Clusters commissioned by the GLA continued to perform well and clusters specifically addressing the needs of students with SEND would feature in the next procurement round.

Apprenticeship Update (verbal update)

- 5.4 London local authorities have explored the potential for collaboratively procuring Apprenticeship provision for roles where there is cross-borough demand. The Apprenticeship Subgroup will undertake its annual data collection exercise for numbers of local authority apprenticeships delivery and pay scales; this report goes to Leaders, Chief Executives, ALDCS, ASG members and respondents (pay scales report is shared with ASG members and respondents only). There is concern that September will see a several employers losing unspent levy funds.

Action: Updates on apprenticeship activity to be provided at each Board meeting.

6 Annual Statement of Priorities

- 6.1 Some of the context and actions from last year's Statement should be carried forward into this year's statement. The meeting also agreed some textual amendments. The Board agreed that a framework for a three-year vision to 2023 should be presented to its next meeting.

Action: Incorporate suggestions and re-circulate to Board for final sign off. Present a framework for a three-year vision to 2023 to the next Board meeting.

7 Revised Terms of Reference – Operational Sub-group

- 7.1 The meeting agreed to an amendment - sub-regional representation by local authorities should be agreed with ALDCS. Subject to that change, the Board agreed revised terms of reference.

Action: Incorporate revisions to OSG Terms of Reference.

8 AOB

- 8.1 The 'Love our Colleges Campaign' is continuing with a hundred and forty-six MPs signed up. The focus is now on ensuring increased funding for both delivery and pensions.
- 8.2 The DWP is working closely with the Careers and Enterprise Company's Enterprise Advisors in its programme of engaging with schools on careers advice.

Date of the next meeting: Thursday 6 June 2019, 10am – 12noon, London Councils

Leaders' Committee

Report from the London Councils' Grants Committee – 20 March 2019

Item no:

Report by: Ana Gradiska **Job title:** Principal Governance and Projects Officer
Date: 4 June 2019
Contact Officer: Ana Gradiska
Telephone: 020 7934 9781 **Email:** ana.gradiska@londoncouncils.gov.uk

Attendance: Cllr David Leaf (LB Bexley), Cllr Margaret McLennan (LB Brent), Alderman Dhruv Patel (dep – City of London), Cllr Hamida Ali (LB Croydon), Cllr Miranda Williams (RB Greenwich), Cllr Philip Glanville (Chair – LB Hackney), Cllr Patrick Perryman (dep – LB Haringey), Cllr Sue Anderson (LB Harrow), Cllr Viddy Persaud (LB Havering), Cllr Katherine Dunne (LB Hounslow), Cllr Gerard Hargreaves (RB Kensington and Chelsea), Cllr Sam Foulder-Hughes (RB Kingston Upon Thames), Cllr Una O'Halloran (LB Islington), Cllr Jonathan Slater (LB Lewisham), Cllr Edith Macauley (LB Merton), Cllr Charlene McLean (LB Newham), Cllr Helen Coomb (LB Redbridge), Cllr Gareth Roberts (LB Richmond), Cllr Rebecca Lury (LB Southwark), Cllr Marian James (LB Sutton), Cllr Candida Ronald (LB Tower Hamlets), Cllr Paul Ellis (LB Wandsworth), Cllr Tim Mitchell (dep – City of Westminster), Connie Cullen, London Hub Manager at Shelter UK (for Item 4), and London Councils officers

1. Apologies for Absence and Announcement of Deputies

1.1 Apologies were received from Cllr Saima Ashraf (LB Barking and Dagenham), Cllr Richard Cornelius (LB Barnet), Cllr Colin Smith (LB Bromley), Cllr Jonathan Simpson (LB Camden), Cllr Ben Coleman (LB Hammersmith and Fulham), Cllr Mark Blake (LB Haringey), Cllr Douglas Mills (LB Hillingdon), Cllr Andy Wilson (LB Lambeth), Cllr Louise Mitchell (LB Waltham Forest), and Cllr David Harvey (City of Westminster).

The Chair welcomed Una O'Halloran, who has replaced Cllr Kaya Comer Schwartz as the representative for LB Islington, and congratulated Cllr Margaret McLennan for her new role on the Grants Executive.

2. Declarations of Interest

2.1 Cllr Helen Coomb (LB Redbridge) declared that her sister was a trustee of Redbridge CVS. 2.2 The Chair declared that he used to work closely with Shelter in his role as Cabinet Member for Housing. 2.3 Cllr Anderson noted that her son may have received support through the European Social Fund (ESF).

3. Minutes of the Grants Committee meeting held on 21 November 2018

3.1 The minutes of the Grants Committee meeting held on 21 November were agreed. The Chair requested that in future, as well as going to the Leaders Committee, the minutes of the Grants Executive should be presented at the Grants Committee meetings, for noting.

4. Thematic Review – Co-Location: Shelter and Ealing Council

4.1 Connie Cullen, London Hub Manager, gave apologies on behalf of LB Ealing representatives who were due to attend the meeting but were delayed due to transport issues.

- Ms Cullen gave a presentation on the STAR (Supporting Tenancies, Accommodation and Reconnections) partnership, a multi-agency partnership programme which provides free housing, welfare and debt advice, delivers support to clients in the private rented sector, and helps clients to access employment and training. She said that the majority of existing clients (81 per cent) are single people with no dependents, living in overcrowded properties with extended families.

4.2 Other features of the partnership include:

- Co-location - Joint working with LB Ealing in order to prevent homelessness, such as working together to resolve rent arrears.
- Working in partnership with other agencies such as outreach teams for single homeless people.

5. Performance of Grants Programme 2017-21

5.1 Yolande Burgess, Strategy Director, introduced this paper and said that:

5.1.1 Priority 1 and 2 commissions were performing well in general.

5.1.2 One of the commissions in Priority One – Signhealth – was currently RAG rated AMBER, due to lower outcomes achievement and a reduction in their Contract Compliance score (i.e. accuracy, timeliness and risk management). Ms Burgess said that the Grants team was satisfied that this was a temporary issue related to changes in staffing and that Signhealth's RAG score was expected to recover in subsequent quarters. Meanwhile, the commission's performance would be kept under review.

5.1.3 The delivery of the Priority 2 Commission that works within schools - Tender Education and Arts - is subject to the academic year timetable and this is reflected in its outcomes.

5.1.4 Two London Councils funded commissions (delivering across Services Areas 2.2 and 2.3) have submitted bids to the Home office to deliver national domestic violence helpline services. The Home Office has yet to announce its decision. Officers will keep Members informed as to any potential impact to the London Councils grant funded services.

5.1.5 In response to members' queries about over-performance and whether this meant that some targets may have been set too low, Ms Burgess said that this was being monitored closely; the majority of commissions were reporting a significant increase in demand for services.

5.1.6 In response to members' concerns about whether the strong performance of New Horizons Youth Centre would continue following the award of a grant from the Mayors' Fund for Londoners, which may put pressure on their resources, Ms Burgess said that there were no indications that the existing commission would be adversely affected.

5.1.7 All Priority 3 projects are RAG rated Red and are at highest level of risk intervention. This is due to the risks associated with the compliance regime for ESF. All partners in this priority are subject to a monthly 100 per cent check of activity and evidence to mitigate the risk of non-compliance with ESF and to closely monitor performance. With the introduction of a robust quality assurance process, and payments based on delivery of results, a monthly payment model is low risk.

5.1.8 Options for using the projected underspend related to the withdrawal of a Priority 3 partner and the under delivery across the Priority, were discussed with Grants Executive in February 2019; these will be discussed under item 6.

6. Priority 3: Options for anticipated underspend

6.1 The Chair introduced this report and noted that a correction had been tabled for the information contained in Table 1.3. He added that:

6.1.1 The Priority 3 strand of the 2017-2021 London Councils Grants Programme – Tackling poverty through employment – will complete at the end of June 2019. The programme is funded by the Grants Committee and is match-funded by ESF. Based on the delivery profile to-date, the programme is estimated to outturn on completion at over £3 million; half this value is attributable to the Grants programme. Considering management and administration costs, it is projected that circa £1,135,000 will be returned to the Grants Programme once Priority 3 has completed (this is an estimated value).

6.1.2 Tendering a new commission through an open bid procedure, to meet a London-wide priority, had been discussed and considered by Grants Committee Executive members at their February meeting. It was noted that having a new tender that would address a pan-London issue would require a lengthy, resource intensive process. Along with all the associated risks attached to tendering, it was agreed that a new tender was not a preferred option.

6.2 The Grants Committee was then asked to comment on the remaining three options:

Option 1: To commission additional activity within existing commissions delivering across Priority 1 and Priority 2 to address the needs of London residents impacted by No Recourse to Public Funds (NRPF) - that is, residents who are permitted to live in the UK but are subject to the condition of no entitlement to public funds such as welfare benefits and housing assistance from the state. The mid-programme review had highlighted that there are services at capacity due to increases in demand and a rise in complexity of need.

Option 2: To hold the underspend in reserves to allow the Grants Committee more time to consider the redeployment of funds.

Option 3: To return funds to the boroughs through a one-off repatriation from reserves in 2020-21

Following key considerations during their discussions - geography/reach (pan-London); no duplication with existing borough services; impact (improved outcomes), and; savings to boroughs - Grants Executive members considered that investing additional resources in addressing the needs of those with NRPF would be a reasonable course of action. It was noted that:

- There is currently significant pressure on local authority staff resources relating to NRPF; for example, following up with the Home Office, gathering caseload information, resolving priority cases.
- NRPF related pressures impact all the boroughs, placing increased service and financial pressure as local authorities are often left with the responsibility to provide for subsistence and accommodation needs that, under different circumstances, would be centrally funded. At the moment, local authorities receive no additional funding for these costs
- NRPF related expenditure for the boroughs mainly arises through the need to support families with children, and care leavers.
- The issues of NRPF, homelessness and domestic violence are interrelated.

6.3 Grants Committee members agreed that Option 3 should not be taken forward on the basis that the funding can have a greater impact pan-London.

6.4 The Grants Committee decided that whilst the option of holding the underspend in reserves for now should not be taken off the table, Option 1 - investing the funding in addressing issues related to NRPF - would be the preferred option to be presented to the Leaders' Committee in the summer.

The Chair asked Ms Burgess to undertake further work to examine NRPF issues and potential solutions necessary to address them, to present at the next Grants Committee meeting.

The meeting finished at 12.30

Leaders' Committee

Report from the Transport & Environment Committee – 21 March 2019

Item no:

Report by: Alan Edwards **Job title:** Governance Manager
Date: 4 June 2019
Contact Officer: Alan Edwards
Telephone: 020 7934 9911 **Email:** Alan.e@londoncouncils.gov.uk

Summary: Summary of the minutes of the London Councils' Transport & Environment Committee held on 21 March 2019

Recommendations: For information.

1. Attendance: Cllr Syed Ghani (LB Barking & Dagenham), Cllr Shama Tatler (LB Brent), Cllr William Huntington-Thresher (LB Bromley), Cllr Stuart King (LB Croydon), Cllr Julian Bell (LB Ealing - Chair), Cllr Daniel Anderson (LB Enfield), Cllr Denise Scott-McDonald (LB Greenwich), Cllr Chris Kennedy (LB Hackney- Deputy), Cllr Wesley Harcourt (LB Hammersmith & Fulham), Cllr Matt White (LB Haringey - Deputy) Cllr Chloe Smith (LB Harrow - Deputy), Cllr Osman Dervish (LB Havering), Cllr Hanif Khan (LB Hounslow), Cllr Claudia Webbe (LB Islington), Cllr Hilary Gander (RB Kingston-upon-Thames), Cllr Claire Holland (LB Lambeth), Cllr Brenda Dacres (LB Lewisham), Cllr Nick Draper (LB Merton - Deputy), Cllr John Howard (LB Redbridge), Cllr Alexander Ehmann (LB Richmond-upon-Thames), Cllr Richard Livingstone (LB Southwark), Cllr Manuel Abellan (LB Sutton), Cllr Clyde Loakes (LB Waltham Forest), Cllr Richard Field (LB Wandsworth), Cllr Tim Mitchell (City of Westminster), Cllr Jeremy Simons (City of London – Deputy), and Alex Williams (Transport for London).

2. Apologies for Absence: Cllr Dean Cohen (LB Barnet), Cllr Feryal Demirci (LB Hackney), Cllr Kirsten Hearn (LB Haringey), Cllr Varsha Parmar (LB Harrow), Cllr Martin Whelton (LB Merton), and Christopher Hayward (City of London).

3. Ultra Low Emission Zone (ULEZ) Update

Shirley Rodrigues, Deputy Mayor for Environment and Energy, GLA, made some of the following comments:

- Mayor had brought forward the ULEZ to address the health crisis caused by London's toxic air.
- Number of people have lifelong illnesses due to air pollution, with the poorest being the most affected.
- Vehicles, especially diesel vehicles, were the main causes of air pollution.
- Central London ULEZ starts on 8 April 2019 and will operate 24 hours a day, every day of the year. There would be a charge of £12.50 per day for non-compliance (cars, motorcycles and vans), and £100 for lorries, buses and coaches.
- The ULEZ replaces the T-Charge in central London and vehicles must meet strict emission standards to drive in the ULEZ area.
- ULEZ extension to inner London takes place from October 2021 and LEZ would be Londonwide (lorries over 3.5T) on 26 October 2020.

A Q and A session then took place. The Chair thanked Shirley Rodrigues for her presentation.

It was agreed to take item 6 “Air Quality Update” in the agenda next.

6. Air Quality Update

The Committee received a report that provided members with an update on London Councils’ proposals and engagement plans for air quality policy in the upcoming Environment Bill.

The Chair welcomed Jeremy Simons and the other City of London Corporation colleagues. Katharina Winbeck, Head of Transport, Environment and Infrastructure, informed members that the Environment Bill would go before Parliament in late June 2019. She said that although a number of issues would be included in the Bill, it did not address all clean air legislation. What was required a “stand alone” Clean Air Act. Katharina Winbeck said that London Councils had signed up to an “agreed position”, details of which could be found at Appendix 1 of the report. She said that London Councils supported a Clean Air Bill, and any important issues needed to be raised now.

Jeremy Simons, Chair of City of London Corporation, Public Health and Environmental Services Committee, said that the City of London had issues with regards to air quality. He said that the Bill focused on a number of measures to improve air quality, like dealing with idling cars and reducing wood stove burning. Jaysen Sharpe, City of London Assistant Parliamentary Affairs Counsel, informed Committee that the Private Members Bill would be introduced in the House of Lords in the next Parliament.

A Q and As session took place.

The Committee: **(i)** noted and commented on the report, and **(ii)** agreed the approach to influencing new clean air legislation.

4. Chair’s Report

The Committee considered a report that updated members on transport and environment policy since the last TEC meeting on 6 December 2018 and provided a forward look until the next TEC meeting on 13 June 2019.

The Committee: **(i)** noted that more clarity was needed with regards to TEC’s advisory role on the TfL Board, and that further discussions would take place with the Deputy Mayor for Transport on this matter; and **(ii)** noted the Chair’s report.

5. London Fuel Poverty Partnership

The Committee received a report that provided members on the work of the London Fuel Poverty Partnership (LFPP). Councillor Webbe (LB Islington) was the TEC representative on the London Fuel Poverty Partnership.

Councillor Webbe introduced the report, which discussed the impact people’s health that arose from people not being able to afford to heat their homes. She informed members that between 2015 and 2018, an average of 3,240 more people died in London each winter, compared with the rest of the year. Councillor Webbe said that the LFPP was established in May 2018 and brought together a large number of stakeholders including local government, social care and energy suppliers.

The Committee: **(i)** noted and commented on the report, and **(ii)** agreed to work with colleagues in their boroughs to implement recommendations from the Fuel Poverty Partnership, as outlined in paragraph 9 of the report.

7. Go Ultra Low City Scheme (GULCS) Project Update

The Committee received a report that updated members on the progress of Phase 1 of the GULCS project and current plans for Phase 2. The report also reminded TEC members to sign the amendment to the TEC Agreement to delegate the borough’s functions relating to Electric Vehicle Charging Apparatus to London Councils’ TEC, which was a requirement for London Councils to play an active role in Phase 2 of the project (see paragraph 12).

The Chair thanked the boroughs that sent in their 20 rapid charging sites on time.

Katharina Winbeck introduced the report and made some of the following comments:

- Boroughs had made good progress in procuring suppliers to deliver electric vehicle (EV) charging points in residential areas.
- Approximately 400 charge points had already been installed, along with 800 forecasted to be installed by 31 March 2019.
- This was a “good news” story, with better prices being negotiated. Thanks to boroughs for all their hard work on this.
- Phase 2 stage of the GULCS project could now be looked at again, including an objective to provide a centralized delivery partnership.

The Committee: **(i)** agreed to send an individual letter to those boroughs that had not yet signed the amendment to the TEC Agreement, which would give London Councils permission to actively participate in Phase 2 of the project, and **(ii)** agreed that Alex Williams would look to see where TfL were with regard to the installation of rapid charging points in the Royal Borough of Kingston.

8. Fixed Penalty Levels for new Wandsworth Byelaws

The Committee considered a report that informed members of the request from LB Wandsworth to TEC to set Fixed Penalty Notice (FPN) levels for the new Wandsworth byelaws relating to parks and open spaces, so that local authorities could issue FPNs rather prosecute offenders.

The Committee: **(i)** agreed that London Councils consulted on the levels of fixed penalty for breaching the new Wandsworth byelaws, as set out at Appendix A; and **(ii)** agreed that London Councils consulted on a fixed penalty level of £80, payable within 28 days and an early payment reduction to £50, if paid within 14 days.

9. Enforcing London Speed Limits Update

The Committee received a report that provided members with an update following TEC’s agreement in December 2018 to explore the feasibility of boroughs enforcing speed limits on London roads.

Spencer Palmer, Director of Transport and Mobility, London Councils, said that Committee had agreed at its meeting on 6 December 2018 that it would carry on with the work on enforcing London speed limits. This report gave an update on the progress with this. TEC had been working in collaboration with TfL and the Metropolitan Police and had formed a Steering Group to provide a strategic overview of the aims of the review, and setting out reporting structure and strategy. Spencer Palmer said that a further update would be presented to TEC at the meeting on 13 June 2019.

Councillor Loakes thanked officers for the update. He said that some boroughs now wanted to undertake their own trials to ensure the compliance of speed limits on their roads. Councillor Loakes said that boroughs now needed the ability to enforce speed limits, sooner rather than later, as this would help to improve people’s lives.

Councillor Field said that enforcing London speed limits should be put high up on the agenda and TEC should have this as an “ongoing” project. He said that 20mph speed limits saved lives.

The Committee: **(i)** noted that a further update on enforcing London speed limits would be presented to TEC on 13 June 2019, **(ii)** noted that Alex Williams would find out the timetable for 20mph limits on TfL roads in the borough of Wandsworth, **(iii)** noted that Alex Williams would look into 20mph limits at Seven Sisters, **(iv)** noted that education should not be neglected, with regards to the road safety reasons for implementing speed limits, **(v)** agreed to consider setting up a separate TEC sub-group to provide political oversight and to report back to TEC, **(vi)** noted that members were unhappy with the extent and pace of progress with this matter and that the TEC Reserve budget could be used to fund additional resources and to fund a borough speed enforcement pilot (subject to legal constraints on boroughs’ current powers), **(vii)** noted that Alex Williams would feed back member comments regarding 20mph speed limits on the TLRN, **(viii)** noted that London Councils efforts on this work should be focused on acquiring the necessary legislative powers for boroughs to carry out their own speed enforcement; and **(ix)** noted that ensuring boroughs can enforce their local speed limits effectively was a top priority for TEC.

10. Direct Vision Standard for Heavy Goods Vehicles

The Committee received a report that updated members on the development of a Direct Vision Standard (DVS) and the proposed London Heavy Goods Vehicles (HGVs) Safety Permit (HSP) Scheme to reduce road danger in London.

Spencer Palmer introduced the report, which sought member formal approval to appoint TfL, on its behalf, to undertake Phase 2c consultation on the finalized HGV Safety Permit.

The Committee: **(i)** noted the borough stakeholder and other responses to the Phase 2b consultation, **(ii)** approved, for the purposes of the Phase 2c Consultation: 1. the final HGV Safety Permit HSP Scheme proposals, 2. the promotion by TEC of an Amendment Order to amend the 1985 Order Appendix A and related Statement of Reasons Appendix B, 3. the LLCS & HSP Policy Statement Appendix C and 4. HSP Scheme Conditions draft Appendix D, **(iii)** appointed TfL to undertake the Phase 2c Consultation on its behalf, beginning on 26 April 2019, and (subject to recommendation (4) below and to consultation with London Councils' Director, Transport & Mobility where any potentially significant issues/ matters arise), to draft the Amendment Order to reflect Appendix A and to make any necessary provisional public inquiry arrangements, **(iv)** noted that a report may be brought to the Committee's June meeting to consider any formal objections to the Amendment Order and other relevant representation received in response to the Phase 2c consultation; and **(v)** noted the position regarding Barnet LBC participating in the HSP Scheme and the LLCS.

11. Freedom Pass Progress Report

The Committee considered a report that provided members with an update on the outcome of the Freedom Pass mid-term review, proposals for the future administration of the renewal exercises, a reminder to boroughs regarding the assessment of eligibility for the disabled persons Freedom Pass scheme, and the outcome of negotiations with the Rail Delivery Group (RDG) in respect of the 2019/20 Freedom Pass settlement.

Stephen Boon, Chief Contracts Officer, London Councils, introduced the report. He said that the Committee was recommended to agree Option B for processing future renewal exercises. TEC was also being asked to decide whether to grant London Councils' permission to formally consider taking over the administration of the disabled persons' scheme after the 2020 renewal.

The Committee: **(i)** noted the progress of the 2018 mid-term review and 2019 renewal, **(ii)** agreed to Option B for processing future renewal exercises, **(iii)** noted the roles and responsibilities of borough concessionary travel teams in respect of disabled persons Freedom Pass renewals and ensure sufficient resources are in place to undertake the 2020 renewal, **(iv)** agreed to come back to a future TEC with cost proposals for London Councils to undertake the administration of the disabled persons Freedom Pass scheme, and **(v)** approved the reduced RDG settlement amount of £19,450,000.

12. TEC & TEC Executive Sub Committee Dates 2019/20

The Committee received a report that notified members of the proposed TEC and TEC Executive Sub Committee dates for the year 2019/20. The Committee agreed the dates for TEC and TEC Executive Sub Committee meetings for the year 2019/20.

13. Minutes of the TEC Executive Sub Committee meeting held on 7 February 2019 (for noting)

The minutes of the TEC Executive Sub Committee held on 7 February 2019 were noted.

14. Minutes of the TEC Main Meeting held on 6 December 2018 (for agreeing)

The minutes of the TEC Main meeting held on 6 December 2018 were agreed as an accurate record.

The press and public were asked to leave the room while the exempt part of the agenda was discussed.

The meeting finished at 16:55pm

Minutes of the Meeting of the Audit Committee 21 March 2019

Cllr Roger Ramsey was in the Chair

Members Present:

Cllr Roger Ramsey (LB Havering)
Cllr Stephen Alambritis (LB Merton)
Cllr Robin Brown (LB Richmond)

In Attendance:

Pat Stothard, Head of Audit & Risk Management, City of London
Martha Franco-Murillo, Senior Auditor, City of London
Neil Hewitson, Director, KPMG

London Councils' officers were in attendance.

1. Apologies for Absence

An apology for absence was received from Councillor Victoria Mills (LB Southwark).

2. Declarations of Interest

There were no declarations of interest.

3. Minutes of the Audit Committee meeting held on 18 September 2018

The minutes of the Audit Committee meeting held on 18 September 2018 were agreed as being an accurate record.

4. Internal Audit Plan 2019/20

The Audit Committee received a report that informed members of the draft internal audit plan for 2019/20, as proposed by the City of London's Internal Audit section under terms of the service level agreement for financial and payroll services.

David Sanni, Chief Accountant, London Councils, introduced the internal audit plan for 2019/20, and the proposed five-year rolling programme covering the period up to 2023/24. He said that the internal audit section had invited London Councils' Corporate Management Board to recommend any areas to be included in the plan. David Sanni confirmed that all areas of operational risk are examined at least once during the five-year period.

The Chair asked whether the Pension Scheme Administration review (page 11), that related to the pension arrangements for the parking adjudicators, would require 10 audit days, as this was a small pension scheme. Pat Stothard, Head of Internal Audit, City of London, informed Committee that the 10 audit days was the normal amount of time expected to be spent on this, although the work might be able to be completed in less days.

Councillor Brown said that there was a big gap between the date of the last audit (2017) for the "ICT Data and Information Security" (page 13) and the new audit (2021/22). Pat Stothard said that this represented the current London Councils' base plan, although this work area could be brought forward to a shorter cycle, if so required.

The Audit Committee approved the internal audit plan for 2019/20 and the rolling five-year programme, covering the period 2023/24 as proposed by the City of London and detailed in Appendix A of this report.

5. External Audit Plan 2018/19

The Audit Committee received a report that presented members with the draft external audit plan for 2018/19, prepared by London Councils' external auditor, KPMG. The draft audit plan informed the Audit Committee of the scope of the external audit for London Councils for 2018/19.

David Sanni introduced the report, which detailed the external audit plan, along with any significant risks. Neil Hewitson, Director, KPMG, said that the plan covered the three main London Councils' committees (Leaders, Transport and Environment Committee and Grants). He informed members that two significant risks had been identified – management override of controls and pensions liabilities assets.

Neil Hewitson informed Committee that the audit fee had increased from £36,000 in 2017/18 to £38,000 in 2018/19. The £2,000 increase was due to new accounting requirements relating to IFRS 9, IFRS 15, along with reporting requirements associated with the AR27 Employers' Association annual return. The Chair asked whether the £2,000 increase in fees for the IFRS 15 and AR27 was provisional. Neil Hewitson said that there was uncertainty around how much work would be involved in the certification of AR27.

The Audit Committee approved the draft external audit plan for 2018/19 in principle, and the increase of the annual audit fee. The draft plan was included at Appendix A.

6. Internal Audit Reviews

The Audit Committee received a report that provided members with an update of internal audit work that had been undertaken since the last Committee meeting in September 2018.

David Sanni introduced the report and said that a progress report for 2018/19 could be found on page 67 of the report. He said that two reviews had been completed since the last meeting on Parking and Traffic and the Pan London Mobility Schemes. There was one "red" recommendation and six "amber" recommendations included in the "Parking and Traffic" audit report. The "red" rated recommendation related to the adequacy of checks carried out on the Congestion Charge adjudicators' pay claims.

David Sanni said that there were eight "amber" recommendations included in the internal audit report on the pan-London Mobility Schemes, incorporating the Taxicard and Freedom pass schemes. All eight recommendations had been accepted, including the improved reporting of Key Performance Indicators (KPIs). Pat Stothard, Head of Audit Risk Management, City of London, informed members that the work on Business Continuity and GDPR would be completed shortly.

Frank Smith, Director of Corporate Resources, London Councils, said that the first strand of London Councils' IT transformation programme had taken place, with all staff being issued with their own laptop. The second strand would be the migration of data into the Cloud.

Councillor Brown asked whether random checks on eligibility were taking place. Stephen Boon, Chief Contracts Officer, London Councils, confirmed that they were. He said that the target date was 1 April 2019. A small sample would be looked at and this would be carried out on a monthly basis.

The Audit Committee noted and commented on the contents of the report and the appendices.

7. Treasury Management Update

The Audit Committee received a report that provided members with an update on London Councils' treasury management strategy. London Councils' cash balances were held by the City of London under the service level agreement for the provision of financial support services.

David Sanni introduced the report and informed members that it had been agreed by Audit Committee in September 2009 that the Committee would receive annual reports on the City of London's treasury management activities. This report informed the Audit Committee of the City's treasury activities for the coming year. David Sanni said that the balances held by the City on behalf of London Councils were protected against capital losses. The forecast investment return for the 2019/20 is one percent. David Sanni said that London Councils was satisfied that the City's treasury management function was run in a prudent manner. The Chair said that the indemnity of 0.02% that the City charge London Councils for any potential future losses of cash balances was very reasonable.

The Audit Committee noted the City of London's Treasury Management Strategy Statement and Annual Investment Strategy for 2019/20, which could be found at Appendix A.

8. Risk Management: Policy and Public Affairs Risk Register

The Audit Committee considered a report that presented members with the current Policy and Public Affairs directorate risk register for consideration.

Doug Flight, Head of Strategic Policy Group, introduced the Policy and Public Affairs (PaPA) risk register. He informed members that the PaPA risk register was reviewed on a quarterly basis by both the PaPA Divisional Management Team and London Councils' Corporate Governance Officer Group as well as half-yearly by the London Councils' Corporate Management Board (CMB).

Doug Flight highlighted the PaPA 1 risk, which related to the loss of member authority support (eg withdrawing from London Councils) and PaPA 2 risk, which related to the inability to meet all borough expectations with the resources available. Doug Flight said that PaPA risk 7 "IT failure with website/intranet" had now been heightened in terms of likelihood but would be kept under review following a recent IT modernisation programme. PaPA risks 12, 13 and 14 all related to the Capital Ambition (CA) programme. PaPA risk 14 had been given a risk rating (with control) of 8 to allow for the potential of different outcomes.

The Chair asked whether the Capital Ambition programme had been reviewed. Thomas Man, Head of Capital Ambition, London Councils, said that approval was given at the March 2019 Leaders' Committee meeting to undertake a procurement process to extend the London Ventures contract beyond August 2019 and to explore alternative sustainable funding options which was also strongly supported by the Capital Ambition Board. Officers recognised that the very nature of this risk had changed and would review the risk.

Councillor Brown said that PaPA risks 1 and 2 appeared to be the hardest to mitigate, especially considering the constraint on borough budgets at present. He emphasised the need for boroughs to get value for money for the subscriptions being paid to London Councils. He said that boroughs were also fighting hard to get a decent financial settlement for London. Doug Flight said that London Councils was carrying out extensive campaigning for the upcoming Spending Review and was working with external organisations and businesses. Councillor Brown said that this needed to be communicated to lead finance officers.

Councillor Alambritis said that Leaders had been issued with a pamphlet on the areas that London Councils was working on. Doug Flight confirmed that Leaders' Committee had considered a

document which set out a series of pledges that London Councils was committed to work over the next 4-years.

The Audit Committee noted the current Policy and Current Affairs directorate risk register.

9. Review of Risk Management Strategy and Framework

The Audit Committee received a report that summarised the recent review of London Councils' Risk Management Strategy and Framework and associated documents.

Christiane Jenkins, Director of Corporate Governance, London Councils, introduced the report. She informed members that the London Councils' Risk Management Strategy and Framework was last reviewed in September 2016. It was a recommendation of an internal audit which was carried out in 2016 that the Strategy would be reviewed on a "periodic basis" to ensure it was still fit for purpose.

Christiane Jenkins said that the Strategy now included a reference to Information Risks, in the to reflect the importance of protecting information in the light of the new data protection legislation. There were some minor changes to the Strategy and Framework. London Councils' now had a data Protection Officer, Emily Salinger, who was present at the meeting.

The Audit Committee:

- Agreed the proposed revisions to the Strategy and Framework, and
- Noted the changes to the guidance notes

10. Implementing the General Data Protection Regulation (GDPR) and Data Protection Act 2018

The Audit Committee received a report that provided members with an update on London Councils' work on the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA18).

The Chair said that it had been agreed to have the GDPR and Data Protection Act 2018 on the agenda for each Audit Committee meeting, owing to the seriousness of the issue and potential non-compliance. The Chair suggested that the GDPR item should now be brought to this Committee on a yearly basis.

Frank Smith said that the GDPR had been a standing item on the Audit Committee agenda for the last 18 months. The report highlighted the continuing work since the new GDPR was introduced on 25 March 2018. He said that Emily Salinger, the London Councils' Data Protection Officer, had been carrying out robust work with regards to GDPR and DPA18. London Councils' staff were being given a detailed training programme on matters relating to GDPR and DPA18, including "Bob's Business" training, where an online test needed to be completed every month. Frank Smith said that records of staff training activities were kept by London Councils. Continuous training was also taking place at CMB and regular face-to-face training with staff was also taking place.

Frank Smith said that the high risk areas for London Councils were in areas where large amounts of personal data was kept, like for Freedom Pass and Taxicard holders. Staff had been trained on the potential implications of holding this data.

The Audit Committee:

- Noted the work carried out in relation to the GDPR and DPA18; and

- Agreed that this report would now be presented to the Audit Committee once a year in March.

The press and public were asked to leave the meeting while the exempt part of the agenda was being discussed.

The meeting finished at 11:14am

Action Points

10. Implementing the General Data Protection Regulation (GDPR) and Data Protection Regulation Act 2018 Update

Action

It was agreed that a GDPR/DPA18 Update would now be brought to the Audit Committee meeting once a year, in March

Progress

Ongoing