

Summary: Analysis & Evidence

Policy Option 1

Description: Implement the Female Offender Strategy Delivery Plan

FULL ECONOMIC ASSESSMENT

This Impact Assessment presents costs on two bases to cover the entire 3-year strategy period (2022/23-2024/25), and the period from January 2023 onwards (these figures are provided in brackets in the assessment below).

Price Base Year	PV Base Year	Time Period Years	Net Benefit (Present Value (PV)) (£m)		
2022/23	2022/23	3 (<i>January 2023 onwards</i>)	Low: -£41m (-£31m)	High: +£22m (+£31.8m)	Best Estimate: -£10.1m (+£0.38m)

COSTS (£m)	Total Transition (Constant Price) Years	Total Excl Transition (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	N/A	N/A	N/A
High	N/A	N/A	N/A
Best Estimate	N/A	-£67.6m (-£57.5m)	-£67.6m (-£57.5m)

Description and scale of key monetised costs by 'main affected groups'

The main monetised costs of the four priorities associated with option 1 are as followed:

- Priority 1: Fewer women entering the criminal justice system and reoffending £15.5m (£15.5m).
- Priority 2: Fewer women serving short custodial sentences with a greater proportion managed successfully in the community £1m (£0.93m).
- Priority 3: Better outcomes for women in custody £11.4m – (£11.2m).
- Priority 4: Protecting the public through better outcomes for women on release £40m– (£30m).

All costs included in this impact assessment are to the Ministry of Justice (MoJ) and HM Prison and Probation Service (HMPPS).

Other key non-monetised costs by 'main affected groups'

Not all the main affected groups are listed here. However, the main non-monetised costs will fall on the following:

- Prison Services and the MoJ will face increased administrative costs due to the implementation of all the activities.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	N/A	N/A	£26.6m
High	N/A	N/A	£89.3m
Best Estimate	N/A	N/A	£57.5m

Description and scale of key monetised benefits by 'main affected groups'

Option 1 is expected to yield the following monetised benefits:

- Reduced reoffending: Between £18m and £62m for reduction in reoffending due to the impact of the services delivered through the women's community sector – with our best estimate being £40m.
- Improved wellbeing: Between £8m and £26m for improved wellbeing and life satisfaction of the women supported through the women's services that are funded through MoJ grant funding – with the best estimate being £17m.

Other key non-monetised benefits by 'main affected groups'

There are many non-monetised benefits, the below is a list of the key non-monetised benefits:

- Offenders will benefit from increased opportunities for rehabilitation and specialised support available from implementing the activities from the four main priorities of the strategy.
- Reduction in self-harm.
- Improved education, employment, training prospects.
- Improved family ties.
- Reduced homelessness.
- Improved health outcomes.

Key assumptions/sensitivities/risks	Discount rate (%)	3.5%
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There are a number of assumptions, the key assumptions are:

- All the main activities in the Delivery Plan are delivered.
- Future estimated costs are based on current models, knowledge, and markets – but are all subject to change as costs may be affected by inflationary pressure and market changes.
- Health-related benefits have been discounted using the 1.5% discount rate from HMT appraisal guidance.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m: None			Score for Business Impact Target (qualifying provisions only) £m: N/A
Costs: N/A	Benefits: N/A	Net: N/A	

Evidence Base

A. Background

Summary

1. The outcomes for women in, or at risk of entering the criminal justice system (CJS) are poor, and often worse than those for men. Women are a minority in the justice system (4% of those in custody and c. 9% of those under community supervision)¹ which means that they are within a justice system that has been designed largely for the male majority. Women in the criminal justice system are also more likely to have committed low-level offences, to have complex needs and are more likely to receive short custodial sentences. The drivers for women's offending, and the routes out of it, can also differ from those for men and there is growing evidence that a women's-needs-focussed and trauma-responsive approach to the delivery of services is needed to achieve better outcomes for women.
2. The Female Offender Strategy (June 2018)² set out the case for taking a different approach to women in or at risk of contact with the criminal justice system (CJS) in order to improve outcomes at all points of the offender journey. The Strategy advocated for a trauma-responsive approach to address the needs of women in contact with the justice system.
3. The vision in the Strategy recognised early intervention and diversion were key to reducing the number of women entering the CJS and the important role played by third sector women's services. It set out the Ministry of Justice's (MoJ) vision that custody should be a last resort for women, reserved for the most serious offenders, and made clear that most other women should be supported to address their offending behaviour in community settings.
4. Since the Strategy was published, a large amount of progress has been made in delivering the priorities. However, many of the themes that were prominent when the Strategy was published remain important, suggesting that there is a continued need for an effective trauma-responsive approach focussed on women's needs. To show how this is going to be taken forward, the Female Offender Strategy Delivery Plan is being published alongside this Impact Assessment. It responds to the recommendations made by the National Audit Office (NAO) in their report on *Women in the Criminal Justice System* and the House of Commons Justice Committee report³⁴. The Delivery Plan also reflects Ministers' decisions to fund evidence-based activities and invest in pilots to reduce women's reoffending.
5. The Female Offender Strategy Delivery Plan also updates the earlier Female Offender Strategy. The three original priorities of fewer women entering the CJS; more women managed effectively in the community, and better outcomes for women in custody remain. A fourth priority focused on effective resettlement in the community has also been identified to align with the wider government work on reducing reoffending.
6. This overarching Impact Assessment (IA) explains the policy rationale and objectives which underpin the main priorities of the Female Offender Strategy Delivery Plan. It then provides an overview of the funding secured (or estimated costs where known), and the estimated impacts on society (where appropriate).

¹ Probation data - Justice Data

² Female Offender Strategy - GOV.UK (www.gov.uk)

³ Improving outcomes for women in the criminal justice system - National Audit Office (NAO) Report

⁴ Women in Prison (parliament.uk)

Problem Under Consideration

7. In 2022, 17,522 women entered the CJS for the first time⁵, compared to 61,561 men. Research evidence is clear that women represent a distinct cohort of offenders, who present with specific needs, and whose offending differs from men. Many women commit offences that are low-level and non-violent. Much of women's offending is driven by specific factors such as substance misuse, and lack of closeness with family, which are often themselves product of histories of abuse and trauma⁶.
8. This work aims to further address the needs of female offenders and the vulnerabilities that underpin their offending⁷. Contact with the CJS can cause these women to go into or prevent them from coming out of crisis. In 2022 69% of women sentenced to custody serve sentences shorter than 12 months (compared to 52% of men), the majority for non-violent offences such as theft⁸. Conviction itself often means a loss of accommodation, employment, or contact with children and the beginning of a cycle of intergenerational offending.
9. Further, outcomes for women in prison are poor. In 2021, the self-harm rate in the women's prison estate was 3,697 self-harm incidents per 1,000 prisoners – over seven times higher than in male prisons⁹. Female prisoners are also consistently more likely, compared to men, to be identified as having a relationship need¹⁰ (85% vs 71%), a drugs misuse need (53% vs 49%) or an alcohol misuse need (29% vs 20%), with a large proportion having multiple needs¹¹. Once released, women are also more likely to not be in employment, with 87% of women either unemployed or unavailable for work six weeks after release from custody (compared to 80% of released male prisoners)¹². 73% of women released from a custodial sentence of less than 12 months re-offend within a year, compared to 63% of men¹³.
10. Emerging evidence shows that good community management of female offenders leads to better outcomes. The reoffending rate for women on community-based court orders is more than half that of women on short custodial sentences (30% vs 73%)¹⁴. An impact analysis using 2016 data found that short term custody with supervision on release was associated with a statistically significant 4%-point increase in proven reoffending compared to community orders and/or suspended sentence orders for both males and females who were at risk of receiving a short custodial sentence¹⁵.
11. Analysis by the Ministry of Justice's Justice Data Lab analysis also found that female offenders who received support provided by community-based women's centres experienced a reduction in re-offending of 5 percentage points compared to women who were not supported in this way¹⁶. Qualitative evidence also suggests substantial improvements in the relationship, employment, housing, and physical health situations of female offenders benefitting from community-based gender-responsive support¹⁷.

The Female Offender Strategy Delivery Plan

12. The Female Offender Strategy Delivery Plan proposes a range of interventions aimed at improving the outcomes of women at all stages in their CJS journey, and addressing the key gendered

⁵ First time entrants (FTE) into the Criminal Justice System and Offender Histories: Year ending December 2021 - GOV.UK (www.gov.uk)

⁶ Prisoners' childhood and family backgrounds (publishing.service.gov.uk)

⁷ Female Offender Strategy (publishing.service.gov.uk)

⁸ Criminal Justice System statistics quarterly: December 2021 - GOV.UK (www.gov.uk)

⁹ Safety in custody: quarterly update to December 2021 - GOV.UK (www.gov.uk)

¹⁰ This is a measure of issues with relationships within the Offender Assessment System

¹¹ Identified needs of offenders in custody and the community from the Offender Assessment System, 30 June 2021 - GOV.UK (www.gov.uk)

¹² Community Performance Annual, update to March 2022 - GOV.UK (www.gov.uk)

¹³ Proven reoffending statistics: October to December 2016 - GOV.UK (www.gov.uk)

¹⁴ Proven reoffending statistics: October to December 2016 - GOV.UK (www.gov.uk)

¹⁵ The impact of short custodial sentences, community orders and suspended sentence orders on reoffending (publishing.service.gov.uk)

¹⁶ Justice Data Lab: Women's Centres throughout England (publishing.service.gov.uk)

¹⁷ Women-and-Girls-Briefing-Report-Final-_web.pdf (tavinstitute.org)

disparities identified above. While implementing the strategy, we will also further develop the evidence base on what works to prevent reoffending and support rehabilitation for female offenders.

13. Too many women are entering the CJS for low level and non-violent offences. The community sector aims to support women who have been convicted of these types of offences or who are at risk of entering the CJS. By improving our services and increasing the investment in the voluntary sector, who are already active in the female CJS, we can improve outcomes for women.
14. To address the prevalence of short custodial sentences, we are putting in place a number of activities to encourage the use of alternatives to custodial sentences where appropriate. A well-structured community order can result in a lower reoffending rate than a short custodial sentence, yet we also know that there is a need to improve confidence in non-custodial sentencing options^{18,19}. Improving provision of robust non-custodial sentencing options will expand public confidence and improve outcomes for women, and we will achieve this by working with courts to raise awareness of specific issues faced by women.
15. Women in custody are likely to have different needs and challenges to men, and interventions that focus on women's needs are essential to address the trauma which often underlies their offending behaviour, and to support their successful re-entry to the community. The proposed activities will ensure women in prison can access better trauma-informed therapeutic support that responds to their needs, and day-to-day support from prison staff, which addresses their health and well-being.
16. Almost all the women sentenced to custody will be released into the community. However, we know women face specific challenges on release – for example, they are more likely than men to be a primary carer of a child, meaning the accommodation needs of their children also need to be considered, particularly if they are hoping to be reunited with children who have been taken into care. We want women to be supported on release to transition back into the community by securing stable accommodation and education and/or employment; along with the necessary support to enable access to support to manage and overcome other needs, such as mental health problems and substance misuse.
17. As was shown above, the CJS outcomes for women are poorer in comparison to men in several key areas such as self-harm rates in custody, reoffending rates for those on short custodial sentences and employment outcomes upon release. By investing in support for women across the CJS we can address these inequalities and improve outcomes.

B. Rationale & Policy Objectives

Rationale for Intervention

18. The conventional economic approaches to Government intervention are based on efficiency or equity arguments. Governments may consider intervening if there are strong enough failures in the way the markets operate or there are strong enough failures in existing Government interventions where the proposed new interventions avoid creating a further set of disproportionate costs and distortions. The Government may also intervene for equity (fairness) and distributional reasons (e.g. to reallocate goods and services to certain groups in society).
19. The overarching rationale for the commitments detailed in the Female Offender Strategy Delivery Plan is one of equity. As outlined above, women are more likely to have experienced abuse and to suffer from trauma related to their offending, which can lead to higher levels of mental health needs,

¹⁸ See, e.g., https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/706597/do-offender-characteristics-affect-the-impact-of-short-custodial-sentences.pdf

¹⁹ See, e.g., https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/814177/impact-short-custodial-sentences.pdf

substance misuse issues and self-harm²⁰. Government intervention is also needed to reduce the disparities in the CJS outcomes experienced by females relative to males.

20. The Strategy will also promote efficiency through reduced costs to the criminal justice system and other statutory services, and by better protecting the public from crime. Prevention and reduced reoffending should lead to a reduction in crime and therefore lead to fewer victims. There should be lower cost and less pressure on CJS services. In addition, offenders and their families should avoid experiences of crisis and instead begin a path towards more stable living.

Policy objectives

21. The priorities of the Female Offender Strategy Delivery Plan are:

- Fewer women entering the criminal justice system and reoffending;
- Fewer women serving short custodial sentences with a greater proportion managed successfully in the community;
- Better outcomes for women in custody; and
- Protecting the public through better outcomes for women on release

22. These priorities are explained in more detail in the following paragraphs. The Delivery Plan also outlines the metrics that will be used to measure progress against each of these priorities, where applicable.

Priority 1: Fewer women entering the criminal justice system and reoffending

23. Many of the women who come into contact with the CJS have chaotic lifestyles involving domestic abuse, substance misuse, mental health problems. They often commit non-violent, low level offences and are over-represented in prosecutions for specific offences (for example, women accounted for 75% of defendants prosecuted for TV licence evasion, 67% of defendants prosecuted for truancy of a child, and 58% of defendants proceeded against for benefit fraud in 2021²¹). They also often receive short custodial sentences for non-violent offences. In 2021, women sentenced for theft, summary non-motoring offences and miscellaneous crimes against society accounted for over half (57%) of all women given custodial sentences of less than 12 months (compared to 46% of men)²².

24. In some cases, their offending could have been prevented by addressing their vulnerabilities at an earlier stage, including through diversion away from the CJS and into support. Failure to intervene early and to divert where appropriate can result in convictions, which in turn can lead a loss of accommodation and employment, disruption to families and children and the beginning of a cycle of intergenerational offending.

Priority 2: Fewer women serving short custodial sentences with a greater proportion managed successfully in the community

25. We know that short custodial sentences do not deliver the best results for female offenders as women are away from their families and do not have sufficient time to engage with rehabilitative support and address the behaviours that have led to their offending.

26. More than 60 per cent of women in custody have reported experience of domestic abuse, up to a third have been victims of sexual assault, and 50 per cent have drugs misuse needs²³. Without receiving the support, they need women released from custody will likely reoffend, and are overall more likely to do so than men²⁴. A community sentence would enable women to receive targeted

²⁰ Prisoner's childhood and family backgrounds (publishing.service.gov.uk)

²¹ Criminal Justice System statistics quarterly: December 2021 - GOV.UK (www.gov.uk)

²² Ibid

²³ Identified needs of offenders in custody and the community from OASys - GOV.UK (www.gov.uk)

²⁴ 58% of women released from custody in 2016 reoffended within a year, compared to 47% of men (Proven reoffending statistics: October to December 2016 - GOV.UK (www.gov.uk))

support and mean they will be less likely to lose their accommodation and employment. It also limits the disruption to women's families and children, as these relationships are the foundation stone on which a woman can build her new life.

27. In 2022, 2% of women sentenced in England and Wales were given immediate custody, of which 66% were short sentences (less than 12 months) while 6% were given a community order²⁵. In order to reduce the use of short custodial sentences further, courts need more information about the particular issues faced by the women before them and the availability and efficacy of different sentencing options. At the same time, we are also piloting a new time-bound Problem-Solving Court in Birmingham Magistrates' Court that will seek to divert eligible female offenders from custody into stronger judicial led supervision in the community, working alongside probation supervision. Finally, we will seek to encourage alternatives to remand to custody.

Priority 3: Better outcomes for women in custody

28. We recognise that there will always be some women for whom a custodial sentence will be appropriate. We are committed to providing appropriate support and environments that will enable women to address the root causes of their offending behaviour. Evidence shows that ensuring safety is essential to prisoners being able to address their offending needs. We know that women in custody are particularly vulnerable, with a higher prevalence of mental health issues than male prisoners; almost 60% of women in custody report have experience of domestic abuse²⁶; and the self-harm rate is seven times higher than that for men, with young women (18-24 years old) accounting for 26% of all incidents in 2021 despite being only 10% of the population²⁷. Women are also more likely to be primary carers for dependent children, therefore being sentenced to custody is likely to have a more disruptive effect on their families.
29. We will address these needs by improving women's safety in custody; piloting a bespoke approach to managing young women; increasing our specialist support for women in custody; and work with NHS England to support improvements to health and social care. We will upskill our workforce to provide, trauma responsive support taking account of the specific needs of women in our care, and through new facilities will improve the environment of our women's estate to support wellbeing and rehabilitation.

Priority 4: Protecting the public through better outcomes for women on release

30. We know that early days following release are a particularly challenging time and are committed to increasing support for women to reintegrate successfully in their local community and reduce the risk of reoffending. This fourth priority aligns closely with wider government work on reducing reoffending through effective resettlement by focusing on the interventions that are known to work: a home, a job and access to treatment for substance misuse.
31. Through this Delivery Plan we will build on that wider work by focussing on the particular issues that women face. We will ensure that the support that women receive in custody to overcome their complex needs continues into the community. We will provide them with tailored support through the introduction of resettlement passports²⁸, helping them to lead crime-free lives on release. We will help them into work by ensuring access to Employment hubs, Employment Advisory Boards and Employment Leads and have the required identification to commence work in all women's prisons. We are expanding the Community Accommodation Service to provide a stable base on release from prison to those who would otherwise be homeless, including for female prison leavers. Every women's prison will also have access to a Strategic Housing Specialist to support prisons in their response to reducing homelessness.

²⁵ Criminal Justice System statistics quarterly: December 2021 - GOV.UK (www.gov.uk)

²⁶ Female Offender Strategy (publishing.service.gov.uk)

²⁷ Safety in custody: quarterly update to December 2021 - GOV.UK (www.gov.uk)

²⁸ A resettlement passport is a document that brings together all the key pieces of information a prison leaver needs to resettle into the community, including appointments, photocopy of their ID.

C. Affected Stakeholder Groups, Organisations and Sectors

32. A list of the main groups and stakeholders who would be affected by the activities described in this IA is shown below:

- Female Offenders and their families
- HM Prison and Probation Service, which includes both the Prison Service (HMPPS-Prison Service) and the National Probation Service (NPS)
- Women's community sector organisations
- Crown Prosecution Service
- Court Staff (including Court Clerks)
- HM Courts and Tribunal Services (HMCTS)
- The Judiciary
- Local Authorities and local service providers
- Ministry of Justice (MoJ) and other Government departments such as the Department for Culture, Media and Sport (DCMC) and the Department for Levelling Up, Housing and Communities (DLUHC)
- National Health Service, including both NHS-England and NHS-Wales
- Police Services
- The public
- Victims

D. Description of Options Considered

33. To meet the objectives of the Female Offender Strategy, this IA assesses the following options of delivery:

- **Option 0: Do nothing:** Make no changes to the female justice system
- **Option 1:** Implement the Female Offender Strategy Delivery Plan

34. Option 1 is the preferred option as it best meets the Government's policy objectives.

Option 0

35. Under this option, no changes would be made to the current female offender system. As a result, the outcomes for women would not improve as delivery would not better reflect the specific needs of women in the justice system.

Option 1

36. Under this option, we will implement the Female Offender Strategy Delivery Plan. The plan includes commitments made by other government departments, responds to the recommendations made by the NAO in their report on *Women in the Criminal Justice System* and reflects Ministers' decisions to fund evidence-based activities and invest in pilots to reduce women's reoffending. These commitments will underpin the Female Offender Strategy's four main objectives as described above.

37. Details for full activities for the Female Offender Strategy Delivery Plan can be found in Annex A, but for the purposes of this IA, option 1 focuses on those activities where additional targeted funding will be directed to support women in the CJS over the delivery plan period. Option 1 has been split into the four priorities of the Delivery Plan and therefore consists of the following activities:

38. Priority 1: Fewer women entering the criminal justice system and reoffending

- Undertake a grants competition for up to £15.5m (in 2022/23 real terms) multi-year grant funding to support vital community services for women. This activity is made up of the following grant competitions:

- Provide multi-year grant funding to community services for women to support greater financial stability throughout the women's community sector by offering assistance with core costs.
- Provide multi-year grant funding to community services for women to develop and test new or additional services for women.
- Provide funding for the local integration of women's services.

39. Priority 2: Fewer women serving short custodial sentences with a greater proportion managed successfully in the community

- Commence first hearing bail report pilots in Cardiff and Ipswich magistrates' courts to ensure those courts receive advice from the Bail Information Service (BIS) on all women defendants. Ensure that the BIS considers cultural factors and sensitivities in helping to ensure the prioritisation and appropriate use of bail for women from minority groups and those who are foreign nationals. Increase the use of electronic monitoring where this can reduce remand to custody.
- Trial Problem Solving Courts (PSCs)²⁹, including one site in Birmingham that will focus exclusively on women. Learning will also be drawn from the other types of PSC pilots that will also impact female offenders, in particular the Substance Misuse PSCs (Crown Court).

40. Priority 3: Better outcomes for women in custody

- Develop and test a bespoke approach to managing young women in two prisons, including providing a 'step-down' approach to bridging the gap between the high level of support provided in Youth Custody Services and adult custodial provision.
- Expand therapeutic services to meet the needs of the most vulnerable women in our care (supported through enhanced case management) by the recruitment of additional psychology staff.
- Develop and pilot an enhanced approach to supporting women in their first weeks in custody, when they are often at their most vulnerable.
- Improve access to support for domestic abuse or sexual violence by the recruitment of specialist workers in women's prisons.
- Work with partners to develop a pilot for up to three social workers in prisons to support mothers in custody, increase the uptake of Mother and Baby Unit places, support women through family court processes and prepare mothers for resettlement with their children.
- Introduce additional family engagement workers in prisons to support women in maintaining healthy family relationships during their sentence and to prepare them for resettlement.
- Introduce health and perinatal pathway managers in closed women's prisons to provide leadership to ensure that women receive timely and appropriate care.
- Continue work to deliver new facilities in women's prisons, through a combination of Open and Closed places. New open provision will enable women to progress within their establishment without the need to move further from home, allowing them to maintain family

²⁹ Problem Solving Courts will offer community sentences where offenders will see the same judge at least once a month, have intense support and supervision from the Probation Service, and get wraparound services tailored to their individual needs - such as from substance misuse and recovery agencies, housing support and educational services.

ties and support networks. This will improve opportunities for education and employment closer to home, and increase stability, which is important for women in custody.

41. Priority 4: Protecting the public through better outcomes for women on release

- Roll out Prison Employment Leads, Employment Hubs and Employment Advisory Boards in all female prisons to increase the number of women leaving prison with a job.
- Ensure all women's prisons have an ID and Banking Administrator who identify and process applications to enable women to have ID and a bank account for use on release.
- Enable all female prisoners to develop personal learning plans so they can track their education and skills achievements throughout their sentences.
- Deliver the Employment Innovation Fund over a three-year period, to enable Governors to work with more employers and training providers to repurpose workshops, deliver sector specific skills training to meet the changing needs of the economy and smooth the path from prison to employment.
- Invest in expert support such as Head Education, Skills and Work Specialists (HESWs), who will work to improve education and employment results.
- Introduce Support Managers for those with additional learning support needs to all women's prisons by March 2024, helping to ensuring that those prisoners can access education, skills and work opportunities.
- Ensure that a minimum 10% of beds delivered through the Community Accommodation Service (Tiers 1, 2 and 3) are allocated to women in women-only properties so that they feel safe, especially those with backgrounds of abuse.
- Recruit up to 9 F.T.E Strategic Housing Specialists across women's prisons to improve housing outcomes for prison leavers.
- Create more open prison places providing greater geographical spread and increased access, for more women in custody, to open conditions where appropriate, to help them resettle into the community.
- Recruit Health and Justice Coordinators to all Probation Regions to improve access to health and substance misuse services, including developing better continuity of care in their area so that those leaving prison can access treatment and support.
- Roll out additional laptops and licences to prisons to increase the number of prisoners able to attend initial appointments with community drug treatment providers virtually prior to release and increasing access to tele-recovery services.

E. Cost and Benefit Summary

42. This overarching IA follows the procedures and criteria set out in the IA Guidance and is consistent with the HM Treasury Green Book.
43. Where possible, IAs identify both monetised and non-monetised impacts on individuals, groups and businesses in England and Wales with the aim of understanding what the overall impact on society might be from the proposals under consideration. IAs place a strong focus on the monetisation of costs and benefits. There are often, however, important impacts which cannot sensibly be

monetised. These might be impacts on certain groups of society or data privacy impacts, both positive and negative. Impacts in this IA are therefore interpreted broadly, to include both monetisable and non-monetisable costs and benefits, with due weight given to those that are not monetised.

44. Some costs and benefits for some of the activities in the Delivery Plan cannot be disclosed at this time due to being commercially sensitive, or not being available at a granularity to allow for costs related to females specifically to be presented. These activities are assessed qualitatively below.
45. The costs and benefits of each option are compared to option 0, the counterfactual or “do nothing” scenario, where fees are maintained at their current levels. As the counterfactual is compared to itself, the costs and benefits are necessarily zero, as is its net present value (NPV).
46. This IA summarises the main monetised and non-monetised costs and benefits of the activities which are key to deliver the above commitments of the Female Offender Delivery Plan.
47. For some activities in the Female Offender Strategy Delivery Plan, there are expected to be negligible costs. Some of the activities will themselves not involve tangible additional costs but may highlight or propose further investment in the future – for these we have not attempted to quantify any costs or benefits that may result from future decisions.
48. All cost estimates have been assessed using HM Treasury guidance. To make sure our estimates for each activity are comparable, we have adopted the following conventions:
 - Monetised costs and benefits are given in 2022/23 **real prices**³⁰ based on the nominal prices provided to us and the GDP deflator.
 - The monetised costs and benefits have been **discounted**³¹ using a 3.5 per cent discount rate. The resulting Net Present Value (NPV) of each activity has been calculated over the Female Offender Strategy 3-year period.³²
 - Wage costs have had a wage uplift applied before being discounted and deflated.
 - All other costs have been rounded up to the nearest £100k (or £10k where numbers are very small).
 - Where wellbeing benefits have been monetised, a 1.5% health discount factor has been applied in accordance with HMT guidance. Optimism Bias has been applied to the Problem-Solving Court activity at approximately 20% but there may be small variation on individual cost lines. All other activities are based on maximum estimated spend and therefore no optimism bias has been applied.
49. The Female Offender Strategy Delivery Plan sets out the commitments and interventions that are being delivered from 2022/23 to 2024/25. In order to cover the full costs and benefits of the Delivery Plan, the costs and benefits are presented for the whole three-year period (including sunk costs). In order to present the economic cost, excluding sunk costs, costs are also presented for the period of January 2023 onwards).
50. In what follows, some costs may not sum exactly to the overall totals given due to rounding conventions that have been applied. Likewise, all the costs below are based on our current best estimates. This means all costs are subject to change as the activities get closer to delivery (e.g., due to costs being determined by competitive processes).

³⁰ “Real price is the nominal price (i.e. current cash price at the time) deflated by a measure of general inflation.” – HM Treasury Green Book (Nominal price refers to prices that include inflation they are the actual prices that are paid, or which it is expected will be paid in the future, this is the same price base as is used for public sector budgets).

³¹ “Discounting is a technique that converts future values occurring over different periods of time to a present value by taking account of the human preference for value now rather than later. This concept is known as “social time preference”, and it is applied to real prices expressed in base year values and has nothing to do with inflation” – HM Treasury Green Book

³² “Discount rate is the annual percentage rate at which the present value of future monetary values are estimated to decrease over time” – HM Treasury Green Book

51. It is standard practice in MoJ IAs not to assess the direct and reasonable impacts on offenders of the sentences imposed on them by the courts (e.g., loss of liberty and earnings etc) as these are integral to the nature of legal punishment. However, as the aim of the Female Offender Strategy Delivery Plan is to ensure that the particular and pre-existing needs and vulnerabilities of female offenders are met while they are within the CJS (including by ensuring that the sentencing options available to the courts are appropriate), the associated benefits to female offenders have been included in what follows. It is also expected that these benefits will persist after female offenders exit from the CJS and so will continue to contribute to the welfare of the women, their families and wider society.

Option 1: Implement the Female Offender Strategy Delivery Plan

Costs of Option 1

52. Some costs and benefits for some of the activities in the Delivery Plan cannot be disclosed at this time due to being commercially sensitive, or not being available at a granularity to allow for costs related to females specifically to be presented. These activities are assessed qualitatively below.

Priority 1: Fewer women entering the criminal justice system and reoffending

Monetised Costs

53. Within the first priority of the Female Offender Strategy, the following activities are assessed quantitatively:

- Undertake a grants competition for multi-year grant funding to support vital community services for women by offering assistance with core costs, funding new or additional services for women and encouraging a more joined up local partnership working to address women's needs.

54. MoJ will invest up to **£15.5m** across the strategy period (2022/23 to 2024/25) – all of which will be spent from January 2023 onwards This is to support the priority of ensuring fewer women are entering the CJS and subsequently reoffending. A small proportion, £400,000, of this investment will be used to fund an evaluation. The remainder is based on estimated grant funding spend for this financial year, and the maximum agreed funding in the subsequent two financial years.

Non-Monetised Costs

55. To ensure the effective delivery of the grant funding and the investment it will support, there will be an administrative cost to MoJ of managing and distributing grant funding to the women's sector. In addition, the activity of collating and disseminating information about funding sources and delivery mechanisms will incur additional administrative costs, whereby the improved knowledge may lead to increased demand for funding and management.

Priority 2: Fewer women serving short custodial sentences with a greater proportion managed successfully in the community

Monetised Costs

56. Within the second priority of the Female Offender Strategy, the following activities are assessed quantitatively:

- Trial problem solving courts, including one site in Birmingham that will focus exclusively on women. The core components of the costs relate to HMCTS staff costs, drug and alcohol testing provider costs, and MoJ staff costs to deliver an in-depth evaluation of the pilot.

57. MoJ will invest around to **£1m** across the strategy period (2022/23 to 2024/25) – including around £0.93m from January 2023 onwards. This is to support the priority of fewer women serving short

custodial sentences with a greater proportion managed successfully in the community. As part of the costs, an evaluation is planned³³.

Non-Monetised Costs

58. To ensure the aims of priority 2 are met, there will be administrative costs of delivering activities with no direct public money involved. Ensuring suitable alternatives to custody, such as encouraging the wider use of Electronic Monitoring on court bail and improving the suitability of sentences (through the ambition to increase both volumes and quantity of pre-sentence advice going to the Judiciary) may increase the workload of courts, and subsequently HMCTS costs.
59. Within the second priority the costs of the following activities have not been monetised due to either being commercially sensitive or because the cost is not able to be disaggregated at a gender level:
- Commence first hearing bail report pilots in Cardiff and Ipswich magistrates' courts to ensure those courts receive advice from the Bail Information Service (BIS) on all women defendants. Ensure that BIS considers cultural factors and sensitivities in helping to ensure the prioritisation and appropriate use of bail for women from minority groups and those who are foreign nationals. Increase the use of electronic monitoring where this can reduce remand to custody.
60. The anticipated costs include resource costs to HMPPS to implement BIS, and operational costs to HMCTS to support delivery in courts. If Electronic Monitoring use is successfully increased there will also be a cost to probation.

Priority 3: Better outcomes for women in custody

Monetised Costs

61. Within the third priority of the Female Offender Strategy, the following activities are assessed quantitatively:
- Develop and test a bespoke approach to managing young women in two prisons, including providing a 'step-down' approach to bridging the gap between the high level of support provided in Youth Custody Services and adult custodial provision.
 - Expand therapeutic services to meet the needs of the most vulnerable women in our care by the recruitment of additional psychology staff (support through enhanced case management).
 - Develop and pilot an enhanced approach to supporting women in their first weeks in custody, when they are often at their most vulnerable.
 - Improve access to support for victims of domestic abuse or sexual violence by the recruitment of specialist workers in women's prisons.
 - Develop a pilot for up to 3 social workers to support mothers in women's prisons to increase uptake of Mother and Baby Unity places, support women through family court processes and prepare mothers for resettlement with their children.
 - Recruit additional family engagement workers in prisons.
 - Introduce health and perinatal pathway managers in closed women's prisons.
62. MoJ will invest a **up to £11.4m** over the strategy period (2022/23 to 2024/25) – including £11.2m from January 2023 onwards. This cost is made up of additional staff employed by HMPPS to improve the safety in custody for women and around £250k for the project management of all HMPPS Women's spend. There are also proposals to use salaried time of the additional staff for evaluation of these interventions.

Non-Monetised Costs

³³ Costs related to Problem Solving Courts are based on best estimates at this time and will be revised as we learn from the pilot. Also, there are number of assumptions which sit behind the costs including an assumption on the number of cases to be managed by PSCs.

63. To ensure the effective delivery of priority 3, there will be non-monetised administrative costs associated with recruiting the required staff.
64. Within the third priority the costs of the following activities have not been monetised due to either being commercially sensitive, or because they are yet to be determined through ongoing cost modelling:
- Continue work to deliver new facilities in the women's prison estate, through a combination of open and closed spaces within the current estate. Work is needed to further develop the concept designs for gender-specific and trauma-informed female estate, with both open and closed places. On 21st December 2022, Galliford Try signed the contract to take forward the detailed design stage of the contract. This contract is only part of the overall construction contract, the full cost will be determined through the design process.

Priority 4: Protecting the public through better outcomes for women on release

Monetised Costs

65. Within the fourth priority of the Female Offender Strategy, the following activities are assessed qualitatively:
- Roll out Prison Employment Leads, Employment Hubs and Employment Advisory Boards in all women's prisons to improve employment services in prisons. The cost of employment hubs is a one-off upfront cost. Employment leads salary costs only.
 - Invest in expert support such as Head of Education, Skills and Work Specialists in all female prisons, based on c.£80k per specialist role per annum.
 - Introduce Support Managers for those with additional learning support needs to all women's prisons by March 2024, helping to ensuring that those prisoners can access education, skills and work opportunities.
 - Ensure that 10% of beds in the temporary accommodation service (CAS 1, 2, and 3) are allocated to women in women-only properties so that they feel safe, especially those with backgrounds of abuse.
 - Recruit up to 9 F.T.E Strategic Housing Specialists across women's prisons to improve housing outcomes for prison leavers.
66. MoJ will invest a **total of £40m** over the strategy period (2022/23 to 2024/25) – including up to £30m from January 2023 onwards. These costs include a of variety of activities to deliver better outcomes on resettlement. The largest proportion of the cost is for the expansion and allocation of beds in community accommodation services, at a total spend of £33.4m (£25m from January 2023 onwards). The other costs are mostly HMPPS staff salaries. Salary costs are based on average HMPPS salaries. These costs are subject to final salary agreements.

Non-Monetised Costs

67. To ensure the effective recruitment and rollout of resettlement staff and interventions, there is expected to be an administrative cost to MoJ, as well as to local services of providing the services. For example, contract management will incur a cost within the community accommodation services.
68. Within the fourth priority the costs of the following activities have not been monetised due to either being commercially sensitive or because that are not able to be disaggregated at a gender level:
- Ensure all women's prisons have an ID and Banking Administrator who can identify and process applications to enable women to have ID and a bank account for use on release. The costs include salary costs for the administrators in each of the prisons and the identification documents each woman requires. These include a range of document types with variable costs. Additional one-off equipment set up costs have also been incurred.
 - Deliver the Employment Innovation Fund over a three-year period, to enable Governors to work with more employers and training providers to repurpose workshops, deliver sector

specific skills training to meet the changing needs of the economy and smooth the path from prison to employment.

- Recruit Health and Justice Coordinators to all Probation Regions to develop better continuity of care in their area so that those leaving prison can access treatment and support. MoJ will invest to fund 57 posts across England and Wales – of which will work with all genders and it would therefore be difficult to disaggregate the costs to women only.
- Roll out additional laptops and licences to prisons to increase the number of prisoners able to attend initial appointments with community drug treatment providers virtually prior to release and increasing access to tele-recovery services.

Benefits of Option 1

69. The activities which form Option 1 are expected to contribute to the following benefits:

- Reduced offending and reoffending by women
- Improvements in wellbeing for women in the CJS
- Improved family ties
- Reduced self-harm by women in prison
- Improved housing outcomes for women and a reduction of homelessness post-release
- Improved employment and education prospects
- Improved support for staff managing women with challenging behaviour
- Improved health outcomes

70. Below we set out the potential benefits associated with the activities in the Female Offender Strategy Delivery Plan. While most of these benefits cannot be monetised due to a limited evidence base, where the available evidence provides a robust effect size on which to base monetised benefits estimates we have provided this. However, there are several activities that we expect to see benefits from which are described qualitatively. These activities are also expected to generate evidence of what works best in improving outcomes for women, which will subsequently be used to inform the design of future interventions.

Priority 1: Fewer women entering the criminal justice system and reoffending

71. We would expect activities under priority 1 to have an impact on the following areas:

- Reduced offending and reoffending by women
- Improvements in wellbeing for women in the system

Monetised Benefits

Reduced Offending and Reoffending

72. Within the multi-year grant funding for community services there are three separate grant competitions: support with core costs, additional services and interventions, and funding for a local coordinator to support the integration of women service's in local areas into a Whole System's Approach (WSA's).

73. There is evidence to suggest that additional funding of women's services reduces reoffending:

- The MoJ Justice Data Lab quasi-experimental analysis looks at the effectiveness of Women's Centres on reoffending rates. The analysis showed a statistically significant difference in the

re-offending rate for those persons that received support provided by Women's Centres throughout England and the matched control group of between 1 and 9 percentage points³⁴.

- Likewise, an Evaluation of the Pan-Wales Women's Triage scheme³⁵ found the proven reoffending³⁶ rate was a statistically significantly lower in the Diversion Scheme group than in the comparison group (20.2% for those in the scheme, compared to 27.4% for those in the comparison group). As the comparison group was not matched on key characteristics such as risk of reoffending, these figures are only indicative of the potential impact of the WSA model.
- Evidence³⁷ from the UK Women's Budget Group suggests highly intensive interventions cost around £4k per person and low intensity interventions cost around £1.2k with the interventions received depending on the women's need. For the services and interventions grant funding, this would equate to approximately 600 to 2000 women being supported per annum.

74. For both funding for Core Costs and Services and Interventions, the evidence³⁸ on women's centres suggest using a mid-point 5%- point reduction in reoffending. Evidence from Wales WSA³⁹ suggests an indicative 7%-point reduction in reoffending.
75. To monetise the benefit of the reduction in reoffending using the volumes of reoffences for women receiving community sentences, we used Home Office multipliers for the number of wider offences per proven reoffence to account for not all subsequent reoffending being proven. We then used published data on the costs of reoffending⁴⁰ to calculate the average cost per reoffence based on the costs of a theft offence. The cost of a reoffence is based on the cost of a theft reoffence only as this is the most prolific reoffence by the community cohort of women. It includes costs in response to and as a consequence of the reoffence, but not in anticipation of it.
76. Using a 5%-point reduction in reoffending for the Core Costs and Services and Interventions funding, and a 7%-point reduction in reoffending from WSA's funding suggested above, alongside a 1-year lag for the reoffending benefits, and assuming that 50% of women using the service are offenders⁴¹, a £15.5m investment over the strategy period could see a benefit of around £40m (a lower estimate of £18m and higher of £62m) across the three-year Female Offender Strategy appraisal period. This includes those benefits felt from year three spend in the following financial year.

Wellbeing

77. There is evidence that women who are able to access women's centre services will gain improved life satisfaction and wellbeing as a result. This includes improvements in mental health, relationships and life skills.
78. As per HMT's Green Book supplementary guidance on Wellbeing¹⁶, we estimate the benefit of potential improvements in wellbeing using the Green Book estimate for the value of one wellbeing adjusted life year.
79. To do so, we draw on existing studies of the outcome star measure from Greater Manchester WSA⁴². The WSA offers holistic support through a number of women's centres to address the needs of women at risk of and in contact with the CJS. Women who were receiving WSA support were found to experience on average an improvement of 1.5 (on a scale of 1-10) against every assessed need.

³⁴ Justice Data Lab: Women's Centres throughout England (publishing.service.gov.uk)

³⁵ Holloway, K., Williams, K., & Brayford, J. (2017). *Evaluation of the Pan-Wales Women's Triage (The Diversion Scheme)*. Welsh Centre for Crime and Social Justice (WCCSJ)/University of South Wales (USW)

³⁶ Proven reoffences are measured over a one-year follow-up period and a further six-month waiting period to allow for offences to be proven in court.

³⁷ WBG-15-Womens-Centres-Report-v4.pdf

³⁸ Justice Data Lab: Women's Centres throughout England (publishing.service.gov.uk)

³⁹ Holloway, K., Williams, K., & Brayford, J. (2017). *Evaluation of the Pan-Wales Women's Triage (The Diversion Scheme)*. Welsh Centre for Crime and Social Justice (WCCSJ)/University of South Wales (USW)

⁴⁰ Economic and social costs of reoffending (publishing.service.gov.uk)

⁴¹ Women who have access to the WSA's are both offenders, and those at risk of offending, but the proportions are not known exactly, so an assumption is made

⁴² [A Whole System Approach for Female Offenders - Emerging evidence \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

To monetise this change, we have converted the impact into standardised wellbeing effects that can be valued using the HMT guidance. As per HMT guidance, a one-point change in life satisfaction for one-year is assumed to be £13,000 in 2019 prices and values⁴³.

80. When uplifted to 2022/23 prices and discounted using the Green Book 'health' discount rate of 1.5% for 0-30 years, the grant funding could provide a net present benefit of between £8m and £26.9m across the three-year Female Offender Strategy period – assuming that all women who are able to access the service report on average the same level of improvements in wellbeing and life satisfaction as evidenced by the Greater Manchester WSA. The range of benefits demonstrates the different cost of high-level or low-level intensity of intervention women can have access to.

Qualitatively Assessed Benefits

81. By working with police forces, the voluntary sector, the NHS and other Government Departments to support women's needs, address their vulnerabilities and tackle the root causes of offending we anticipate a reduction in prosecutions for low-level and non-violent offences and an increase in vulnerable women being diverted away from the CJS. This should result in a reduction in offending and reoffending and in improved wellbeing. By providing joined up support to help women improve their skills, address substance misuse issues and find suitable housing we anticipate improvements in health, employment and accommodation outcomes.

Priority 2: Fewer women serving short custodial sentences with a greater proportion managed successfully in the community

82. While the benefits for priority 2 cannot be monetised due to no quantitatively assessed activities and a limited evidence base, they are described qualitatively below.

83. We would expect activities under priority 2 to have an impact on the following areas:

- Reduced offending and reoffending by women
- Improvements in wellbeing for women in the system
- Improved family ties

84. By engaging with courts and court processes to improve the use of pre-sentence reports and the provision of bail assistance we envisage an increase in the use of community sentences and alternatives to short custodial sentences for women. As described above, here is evidence⁴⁴ that those sentenced to court orders are less likely to reoffend than those on short sentences.

85. By encouraging the use of community alternatives to custody it is anticipated that women will be able to maintain closer ties with their families. There is evidence to suggest that family support is a factor in reducing reoffending for females in particular. A recent study found that higher levels of emotional support were associated with significantly lower rates of recidivism among a reasonably large sample of prisoners in the U.S. This effect was stronger for incarcerated women than men⁴⁵.

Priority 3: Better outcomes for women in custody

86. While the benefits under priority 3 cannot be monetised due to the limited evidence base, they are described qualitatively below. We would expect activities under priority 3 to have an impact on the following areas:

- Reduced self-harm by women in prison

⁴³ The Outcomes Star uses a scale of 0-10 while the WELLBY scale uses a 1-10 scale. On the Outcomes Star, a score of 0-2 is viewed as being within the same range so this has been converted to a one-point change in order to align the two scales.

⁴⁴ The impact of short custodial sentences, community orders and suspended sentence orders on reoffending (publishing.service.gov.uk)

⁴⁵ Taylor, C. (2015). Gendered pathways to recidivism: Differential effects of family support by gender. Women and Criminal Justice, 25, 169-183. DOI: 10.1080/08974454.2014.989305

- Improved family ties
- Improved wellbeing for women in the system
- Improved support for staff managing women with challenging behaviour

Improved self-harm rates in custody

87. There is evidence⁴⁶ to suggest that both improving environmental factors in custodial settings, and providing therapeutic input to address mental health needs, can improve wellbeing and subsequently reduce the likelihood of women self-harming. The evidence (albeit limited) also indicates that women who have experienced trauma can benefit from psychological interventions that address their trauma symptoms, which have been found to be effective at reducing distress and improving well-being. There is also evidence that access to open green spaces⁴⁷ in prisons can improve mental health and this could consequently help reduce self-harm.
88. By implementing trauma-informed approaches to better address women's needs in custodial settings we aim to address issues that lead to self-harm. This will be done by improving the physical estate, creating more open places and supporting the specific needs of young adult women to make the custodial environment safer and more appropriate and by recruiting and training staff so they are better equipped to support the women in their care.

Improved family ties

89. By creating new units, more women in custody can be held closer to home. Through better understanding of the caring responsibilities of women in custody and by providing social worker support to guide women through the family court system and support them in maintaining relationships with their children it is anticipated that women will be able to maintain closer ties with their families.

Improved wellbeing

90. We envisage an improved experience for women in custody by improving access to health services, providing additional support to help women deal with domestic abuse and sexual violence issues, increasing therapeutic support and improving cultural awareness and specialist skills amongst staff

Improved support for staff

91. By employing and training dedicated prison officers and increasing levels of staff we anticipate that staff across the women's estate will have an improved working environment and better relationships with women in their care.

Priority 4: Protecting the public through better outcomes for women on release

92. While the benefits under priority 4 cannot be monetised due to the limited evidence base, these activities are described qualitatively below. We would expect activities under priority 4 to have an impact on the following areas:

- Reduced offending and reoffending by women
- Improved housing outcomes for women and a reduction of homelessness post-release
- Improved employment and education prospects

Reduced offending and reoffending by women

⁴⁶ Wade, D., Varker, T., & Karatal, D. (2016). Gender Differences in Outcomes Following Trauma-Focused Interventions for Posttraumatic Stress Disorder: Systematic Review and Meta-Analysis, *Psychological Trauma: Theory, Research, Practice and Policy*, 3, 356-364

⁴⁷ Does prison location matter for prisoner wellbeing? The effect of surrounding greenspace on self-harm and violence in prisons in England and Wales - ScienceDirect

93. There is evidence⁴⁸ ⁴⁹that those who are in employment and settled accommodation upon release from custody are less likely to reoffend. Therefore, we anticipate that activities aimed at improving housing and employment prospects will lead to reductions in reoffending amongst women.

Improved Housing outcomes/ Reduced homelessness

94. We will work to improve offender housing pathways, to support prison leavers released into suitable, safe accommodation by working with local authorities, homelessness prevention teams and housing providers and strategic housing specialists. The increased and sustained provision of community accommodation for women post release, across all three tiers, will ensure more appropriate housing options are able to be provided.

Improved Education and Employment Prospects

95. Through the provision of new staff, there is expected to be an improvement in women's education and employment prospects both within, and upon release from custody. Recruitment of new expert support should see benefit realisation by helping to ensure the curriculum within a prison is meeting the learning needs of all prisoners and develops the right skills to support prison leavers to access meaningful employment or further training on release.
96. In addition, by setting up the equivalent of 'job centres' in prisons, women should have better access to employment opportunities, whilst employment advisory boards will support prisons in developing an employment culture and to strengthen links with the business community.
97. New staff will help to introduce improved processes to identify and support prisoner' learning support needs. They will also be responsible for ensuring that all prisoners can successfully access education, skills and work in custody and on release.

Summary and preferred option

98. Our preferred option is 1 as it will help us to address the existing gender-based inequalities in the justice system. As is shown above, this option includes a number of different activities to be implemented, both as full roll outs or as pilot projects, to specified milestones as set out in the Delivery Plan. The Delivery Plan also identifies the owners of each activity both within the MoJ and in other government departments, to be managed through a governance structure.
99. The key activities to deliver the commitments under each section above will be delivered through spending review funding for the 2022-25 period. For women we estimate the total spend will be **£67.6m over the 3-year strategy period, and £57.5m from January 2023 onwards**, to help deliver the Government's vision in the Female Offender Strategy Delivery Plan. We also estimate there to be benefits between £27m and £90m, with the best estimate being £58m across the 3-year strategy period as a result of the investment.
100. Table 1 below outlines those activities that have direct costs associated with them and the NPV (inclusive of monetised benefits) where possible.
101. Table 1 presents these costs using two bases to cover the entire 3-year strategy period (2022/23-2024/25), and the period from January 2023 onwards (these figures are provided in brackets in the assessment below).

Table 1: Summary of Estimated Net Present Costs and Benefits of Option 1 (*Real terms, Discounted Costs in 22/23 Prices*) – *Cost Totals may not sum correctly due to rounding*

⁴⁸ The factors associated with proven re-offending following release from prison: findings from Waves 1 to 3 of SPCR (publishing.service.gov.uk)

⁴⁹ Analysis of the impact of employment on re-offending following release from custody, using Propensity Score Matching (publishing.service.gov.uk)

Activity		Costs	Benefits	NPV
a) Undertake a grants competition for up to £15m (2022/23 prices) multi-year grant funding to support vital community services for women by offering assistance with core costs, funding new or additional services for women and encouraging a more joined up local partnership working to address women's needs.	Monetised	Up to £15.5m in 2022/23 prices across the Strategy Period – (£15.5m from January 2023 onwards)	Reduction in one year proven reoffending rate of 5%-points for core costs and services and interventions, and 7%-point for WSA's, gives a best estimate net present benefit of £42m over 3 years. Wellbeing Improvements of 0.15 WELLBY life year leading to an estimated benefit of around £8m over 3 years, Range demonstrates the various level of intervention costs.	From January 2023 onwards: Low: +£11m (+£11m) High: +£74m (+£74m) Best Estimate: +£42m (+£42m)
	Non-Monetised	Cost to MoJ of distributing and managing funding	Financial stability of the women's sector. Improved quality of service Greater number of women able to access the service Better local integration of women's services for women with complex needs Greater number of women diverted away from the criminal justice system.	
b) Trial problem solving courts, including one site in Birmingham that will focus exclusively on women. The core components of the costs relate to HMCTS, HMPPS and MoJ staff costs, drug and alcohol testing provider costs, and MoJ staff costs to deliver an in-depth evaluation of the pilot.	Monetised	£1m across strategy period (£0.93m from January 2023 onwards)		Best Estimate: -£1m (-£0.93m)
	Non-Monetised	Recruitment of staff Increased demand on local support service	Diversion from custody Improving the welfare of offenders by treating their needs Improved links and relationships between support services	
c) Develop and test a bespoke approach to managing young women in two prisons, including providing a 'step-down' approach to bridging the gap between the high level of support provided in Youth Custody Services and adult custodial provision.	Monetised	£2.6m across Strategy period (£2.6m from January 2023 onwards)		Best Estimate: -£2.6m (-£2.6m)
	Non-Monetised	Set up costs of ensuring the sites are suitable and fit for purpose. Recruitment of staff.	Reduction of Self-harm Reduction of violence Better prisoner-staff relationships, with more frequent and longer interactions Improved safety, respect and purposeful activity	
d) Expand therapeutic services to meet the needs of the most vulnerable women in our care	Monetised	£0.39m across 3-year strategy period (£0.37m from January 2023 onwards).		Best Estimate: -£0.39m (-£0.37m)
	Non-Monetised	Recruitment of staff.	Reduction of Self-harm/Reduction in violence Reduction in distress	

		Increased demand on NHS mental health services.	<p>Strengthened resilience and improved wellbeing</p> <p>Improved safety and purposeful activity</p> <p>Enhanced support for staff in managing those prisoners whose behaviour is challenging, which increases staff resilience and could improve staff retention.</p> <p>Improved understanding of the underlying causes of individuals' challenging behaviour, so staff can respond more effectively to support and meet their needs.</p>	
e) Develop and pilot an enhanced approach to supporting women in their first weeks in custody, when they are often at their most vulnerable.	Monetised	£3.5m across 3-year strategy period to employ various new staff (£3.4m from January 2023 onwards).		Best Estimate: -£3.5m (-£3.4m)
	Non-Monetised	Recruitment of staff.	<p>Reduction of Self-harm</p> <p>Reduction in distress</p> <p>Improved skills and strategies for women to manage their distress</p> <p>Improved understanding of the underlying causes of individuals' challenging behaviour, so staff can respond more effectively to support and meet their needs.</p> <p>Improved support for staff in managing challenging behaviour, which increases staff confidence and resilience and could improve staff retention</p> <p>Better staff/prisoner relationships with more frequent and longer interactions</p> <p>Reduction in violence</p>	
f) Improve access to support for domestic abuse or sexual violence	Monetised	£1m across 3-year strategy period to employ new support workers (£0.98m from January 2023 onwards).		Best Estimate: -£1m (-£0.98m)
	Non-Monetised	Recruitment of staff. Increased demand for NHS services.	<p>Reduction of Self-harm</p> <p>Improved wellbeing</p> <p>Reduction in prisoner on prisoner and prisoner on staff assaults</p> <p>Safety planning as part of resettlement activity.</p> <p>Practical advice and support re: resuming abusive relationships</p> <p>Direct link / signpost into community services</p>	
g) Pilot up to 3 Social Workers to support mothers in the women's estate to	Monetised	£0.33m across 3-year strategy period (£0.33m from January 2023) to		Best Estimate: -£0.33m (-£0.33m)

increase uptake of Mother and Baby Unit places, support women through family court processes and prepare mothers for resettlement with their children.		employ new social workers and conduct an evaluation.		
	Non-Monetised	Recruitment of staff. Increased demand of local social services.	Reduction of Self-harm Improved child safeguarding Improvement in wellbeing of mothers in prison, including improvement in parenting attitudes and reductions in parenting stress	
h) Additional Family Engagement Workers	Monetised	£1.3m across 3-year strategy period (£1.3m from January 2023 onwards).		Best Estimate: -£1.3m (-£1.3m)
	Non-Monetised	Recruitment of staff.	Reduction of Self-harm Improvement in wellbeing of mothers in prison, including improvement in parenting attitudes and reductions in parenting stress	
i) Introduce health and perinatal pathway managers in closed women's prisons	Monetised	£2m across 3-year strategy period (£2m from January 2023).		Best Estimate: -£2m (-£2m)
	Non-Monetised	Recruitment of staff. Increased demand on local social services. Increased demand on NHS.	Improved health outcomes Improved coordination and oversight of health and perinatal services, improved care of women in perinatal pathway and those separated from young children	
j) Roll out Employment hubs, Employment Advisory Boards and Employment Leads in all female prisons	Monetised	£36,000 one-off upfront cost for employment hubs in 22/23 (£0 from January 2023). No cost for advisory boards £1.9m across 3-year strategy period for employment leads. (£1.2m January 2023 onwards) Total of £1.94m across the 3-year strategy period (£.		Best Estimate: -£1.94m (-£1.2m)
	Non-Monetised	Recruitment of staff.	Greater availability and quality of employment opportunities for women in prison More women entering, and staying in, employment post release. Improved coordination of employment partners and services in custody.	
k) Invest in expert support such as Head Education, Skills and Work specialists	Monetised	£1.6m for specialists across the 3-year strategy period. The testing of the role in New Hall commenced in September 2022 and		Best Estimate: -£1.6m (-£1.5m)

		we have committed c.£80k to cover the duration of the 12-month test and learn phase. Total of £1.6m (£1.5m January 2023 onwards)		
	Non-Monetised	Recruitment of staff.	Curriculum which meets the learning needs of all women within the prison, and which aligns with local labour markets. Increased engagement with education and improved employment on release opportunities, both of which contribute to a reduction in reoffending.	
l) Introduce Support Managers for those with additional learning needs to all women's prisons by March 2024, helping to ensuring that those prisoners can access education, skills and work opportunities.	Monetised	£1.6m across the strategy period to fund staff. (£1.2m January 2023 onwards)		Best Estimate: -£1.6m (-£1.2m)
	Non-Monetised	Recruitment of staff.	Improved processes in prisons to identify and support prisoner' additional learning support needs and ensure that all prisoners can access the education, skills and work opportunities within the prison.	
m) Ensure that 10% of beds in CAS3 are allocated to women and increase Community Accommodation Service-Tier 2 provision (formerly Bail, Accommodation, Support Services) for low & medium risk offenders along with continuing to expand female offender provision in Community Accommodation Service-Tier 1 provision (formerly Approved premises) to meet demand.	Monetised	£33.4m across the 3-year strategy period (£25m January 2023 onwards) to fund all three tiers of community accommodation services for women.		Best Estimate: -£33.4m (-£25m)
	Non-Monetised		Fewer women leaving prison homeless	
n) Recruit up to 9 Strategic Housing Specialists across the women's estate	Monetised	9 Strategic Housing Specialist allocated to the women's estate at a cost of £1.2m across the strategy period. (£0.9m January 2023 onwards)		Best Estimate: -£1.2m (-£0.9m)
	Non-Monetised		Improved housing outcomes for female prison leavers	

F. Risks and assumptions

102. The above impacts have been estimated on the basis of a number of assumptions. As each of these assumptions are associated with some degree of uncertainty, there are risks associated with each estimate. Table 2 below sets out the main assumptions and the associated risks and uncertainties.

Table 2: Summary of the Main Assumptions, Risks and Uncertainties associated with Option 1.

	Assumptions	Risks/Uncertainties
a) Provide multi-year grant funding to community services for women to support greater financial stability throughout the women's community sector by offering assistance with core costs.	Costs are based on estimated spend for the current financial year (2022/23), and allocated funding in the two subsequent years. It assumes the full funding will be spent.	The whole amount of funding available will not be distributed because we started the competition late in the first year of three and cannot award funding retrospectively.
b) Provide multi-year grant funding to community services for women to offer new or additional services for women.	The Spending Review funding is used as the estimated cost here, as it assumes the full amount will be provided to women's centres.	
c) Provide funding for local integration of women's services	There is a market/appetite for further integration of local women's services, for which this funding will act as an enabler.	The whole amount of funding available will not be distributed because we started the competition late in the first year of three and cannot award funding retrospectively.
d) Trial problem solving courts, including one site in Birmingham that will focus exclusively on women. The core components of the costs relate to HMCTS staff costs, drug and alcohol testing provider costs, and MoJ staff costs to deliver an in-depth evaluation of the pilot.	Costs are based on best estimates and will be revised as we learn from the pilot. These are based solely on estimated costs for the PSC in Birmingham Magistrates' Court only which will deal specifically with Female Offenders, and do not relate to the wider substance misuse courts.	Inability to recruit staff due to labour market challenges. Potential impact of covid on delivery for example court backlog, staff absences etc.
Women's Safety in Prisons Roles - Overarching		The true costs will not be known until the marketplace has been tested. The availability of staff is also likely to impact on the recruitment of these new posts, due to the number of vacancies already being incurred in Prisons.
e) Develop and test a bespoke approach to managing young women in two prisons, including providing a 'step-down' approach to bridging the gap between the high level of support provided in Youth Custody Services and adult custodial provision.		Inability to recruit staff High staff vacancies in prisons will not support staff being released into these new roles
f) Expand therapeutic services to meet the needs of the most vulnerable women in our care		Inability to recruit staff
g) Develop and pilot an enhanced approach to supporting women in their first weeks in custody, when they are often at their most vulnerable.		Inability to recruit staff High Staff vacancies in prisons won't support staff being released into these new roles.

h)	Improve access to support for domestic abuse or sexual violence	Costs are based on the current best estimates, but until a model is agreed and we go out to the market, costs are subject to change.	Inability to recruit staff
i)	Pilot up to 3 Social Workers to support mothers in the women's estate to increase uptake of Mother and Baby Unit places, support women through family court processes and prepare mothers for resettlement with their children.		Inability to recruit staff needed. Limited local authority resources available to release social workers on secondment.
j)	Additional Family Engagement Workers	Costs are based on the current best estimates, but until we go out to the market, costs are subject to change.	Subject to market engagement and capacity as family services are provided externally
k)	Introduce health and perinatal pathway managers in closed women's prisons		High vacancy levels in prisons won't support managers being released into these roles
l)	Roll out Employment hubs, Employment Advisory Boards and Prison Employment Leads in all female prisons	Evidence from Accelerator project suggests work of Prison Employment Leads is more challenging in women's estate, with fewer positive outcomes compared to male estate	
m)	Invest in expert support such as Head Education, Skills and Work specialists	We have assumed that we will recruit first time round in all sites, for all roles.	Recruiting educational specialists to all sites will be challenging given mandatory qualifications and salary not competitive in standard complexity sites
n)	Introduce Support Managers for those with additional learning needs to all women's prisons by March 2024, helping to ensuring that those prisoners can access education, skills and work opportunities.	We have assumed that we will recruit first time round in all sites, for all roles.	Recruiting Support Managers across all sites will be challenging given mandatory qualifications and experience required and salary being offered. Therefore, delays in recruitment are likely.
o)	Ensure that 10% of beds in CAS3 are allocated to women and increase Community Accommodation Service-Tier 2 provision (formerly Bail, Accommodation, Support Services) for low and medium risk offenders along with continuing to expand female offender provision in Community Accommodation Service-Tier 1 provision (formerly Approved premises) to meet demand.	Assumption of swift mobilisation. Contract costs are based on best estimates and won't be fully known until market engagement stage, and contracts are awarded.	The main risk is that sufficient properties are not secured due to housing market pressures restricting affordability and availability. Risk that properties may not be able to be sourced due to availability in the market, within the specified mobilisation period. However, suppliers are required to have 10% of bed spaces available for women.
p)	Recruit up to 9 Strategic Housing Specialists across the female estate	Ability to recruit all of the Strategic Housing Specialists across the female estate.	Inability to recruit staff due to labour market challenges.

G. Wider impacts

Equalities

103. We hold the view that none of the Female Offender Strategy Delivery Plan activities are likely to be directly discriminatory within the meaning of the Equality Act 2010 as they apply equally to all female offenders. Please see the separate overarching equalities impact assessment published alongside the IA for further details. We believe men are not treated less favourably than women

overall in the wider criminal justice system, as there are a range of other initiatives being taken to meet the needs of male offenders (either initiatives for both sexes or initiatives for male prisoners).

Impact on small and micro businesses

104. There are not assumed to be any direct costs or benefits to business for all activities outlined in the impact assessment.

Better Regulation

105. These activities are out of scope of the Small Business Enterprise and Employment Act 2015 and will not count toward the department's business impact target.

H. Monitoring and Evaluation

106. The Female Offender Strategy Delivery Plan includes details of high-level metrics that will be used to monitor performance against specific activities. This specific metrics for each measurable activity – including planned evaluations.

107. As stated in the Delivery Plan, where sufficient sample sizes of women for reliable analysis are available, we will draw on findings from evaluations that include a female cohort in order to understand the effect of specific activities on outcomes. This includes reviewing data from any metrics devised as part of evaluations. Where it is possible to assess impact, we will also review intentions to assess Value for Money.

I. Annex A – Activities in the Female Offender Strategy not assessed in the Impact Assessment

Priority 1: Fewer women entering the criminal justice system and reoffending

- Support adults facing multiple disadvantages through the Changing Futures programme led by the Department for Levelling Up, Housing and Communities (DLUHC).
- Continue to support the delivery of DLUHC's Supporting Families programme, which works with local areas to offer support to families facing multiple disadvantages including women in the criminal justice system and their families.
- Published guidance for police forces on working with vulnerable women, setting out information on their particular needs and guidance on working effectively with them (2018). In 2019, forces were invited to complete a questionnaire on the impact of the guidance, which identified examples of good practice, but also identified areas for further work.
- Through the NPCC's leadership, develop a tactical toolkit to enable forces to learn from existing best practice. This will be followed by the development of national evidence-based guidance to promote innovative and effective initiatives to improve policing's response to women in or at risk of contact with the criminal justice system.
- Review the use and effectiveness of Out of Court Disposals (OOCs) in responding to the particular needs of women, including opportunities to attach women specific conditions such as referral to a women's centre for support to address her needs.
- Undertake a review of the L&D women's service to identify best practice and produce a lesson learned report, which will offer information and support to areas who wish to further develop their L&D women's service. The review will contribute to ongoing service development.
- Publish guidance to support women to understand what happens at each stage of the criminal justice system, from arrest to sentencing, including the role of practitioners that women will encounter and the meaning of terminology they are likely to hear. The guidance will benefit all women in contact with the criminal justice system, while also reflecting the specific needs of those from ethnic minority backgrounds.
- Work with the Department for Digital, Culture, Media and Sport and the BBC to explore options for piloting TV license enforcement officers signposting women to support, in order to understand the effectiveness of this approach.
- Publish guidance for local areas on how they can make sure organisations are working together to addressing the complex needs of women in or at risk of contact with the justice system.

Priority 2: Fewer women serving short custodial sentences with a greater proportion managed successfully in the community

- Develop, deliver and maintain briefing materials that support regular information sharing sessions for the judiciary and all those who work in courts. The materials will raise awareness of the specific issues faced by women who offend and increase understanding of the possible implications and opportunities of sentencing.
- Remove the power of courts to remand defendants to prison for their own protection solely on the grounds of mental health to stop prisons being used as a place of safety. Clauses were included in the draft Mental Health Bill published on 27 June which is currently undergoing pre-legislative scrutiny.

- We will publish an evaluation of the PSR pilot in spring 2023 and at that point will consider next steps.
- Complete the national roll out of Community Sentence Treatment Requirement sites and in addition to providing Mental Health Treatment Requirement pathways for all adults will also include bespoke women's pathways.
- Explore options for increasing residential provision that could be used as part of a robust community order as an alternative to a short custodial sentence, allowing a woman to stay closer to her family and community with support to address needs underlying her offending behaviour.

Priority 3: Better outcomes for women in custody

- Develop and publish a Young Women's (18-25) Strategy which spans the whole of the CJS, including best practice guidance to support young women in custody.
- Seek to reduce the distance from home and self-harm linked to the impact of moves between prisons for women by exploring options for HMP/YOI Downview and HMP/YOI Drake Hall to receive women from the courts.
- Introduce a new process to attract and select new Prison Officers with the right experience and skills to work specifically in women's prisons.
- Complementing wider cultural competency training for HMPPS staff through the Race Action Programme, we will develop training for staff working with foreign national offender and ethnic minority women in offender management and rehabilitation, to increase awareness of the impact of culture, faith, and sustaining family relationships.
- Complete and publish the joint NHS England and HMPPS Women's Health and Social Care Review and agree next the steps for taking forward its findings and recommendations.
- Develop operational guidance to enable prison staff to understand better the relationship needs of ethnic minority women, where these differ from the majority prison population, which will supplement work arising from the Farmer Review⁵⁰.
- Work with the Department for Education to consider options to improve the visibility and accuracy of data concerning children of prisoners, within the education system, while working to collectively to improve our understanding of the scale of the issue.
- The Prison Strategy White Paper outlined our intention to improve our collective understanding of the overall number of children affected by parental incarceration. Through the Better Outcomes for Linked Data (BOLD) Project we will explore data sharing to improve our understanding of the number of children with parents in prison and how parental incarceration impacts children's outcomes, including education, employment and future offending.
- Develop Design Standards for new accommodation in the women's prison estate that will support effective rehabilitation, building on our learning⁵⁰ from current work developing new facilities in the women's estate.
- Develop the principles for our longer-term ambition to introduce smaller, trauma-responsive custodial environments for women on short sentences. This will focus on how to provide

⁵⁰ Importance of strengthening female offenders' family and other relationships to prevent reoffending and reduce intergenerational crime - GOV.UK (www.gov.uk)

community-based provision in a prison setting, with a focus on addiction issues and complex needs, and on keeping women close to home.

Priority 4: Protecting the public through better outcomes for women on release

- Hold an employment conference in January 2023 to increase awareness of employment opportunities and the different challenges that women face when leaving prison. At the event, we will gather feedback and capture best practice to develop women-specific guidance for Employment Advisory Boards so that they are able to positively impact the lives of women prison leavers, reduce re-offending and meet employers' recruitment needs.
- Develop curriculum guidance to ensure it is gender responsive, trauma informed and include provision that supports prisoners to develop wellbeing, confidence, motivation and resilience building skills.
- Enable all female prisoners to develop personal learning plans so they can track their education and skills achievements throughout their sentences, by March 2025.
- As part of the Government's 10-year drugs plan, DWP committed to invest £21m to expand Individual Placement and Support for Drug and Alcohol Dependency across England by 2025 to support those in treatment, including male and female offenders, to overcome barriers to employment; and £8m in wider employment support, including a peer mentoring programme to help individuals with a dependency move into recovery and closer to work.
- Department for Levelling Up, Housing and Communities to invest over £2bn to tackle homelessness and rough sleeping, demonstrating a commitment to programmes like Accommodation for Ex-Offenders, a local authority-led scheme to help prison leavers in rented accommodation.
- Continue to develop the design of Resettlement Passports and this includes testing with prison and probation staff, charities, and prisoners to ensure it adapts to challenges faced by certain groups, including female offenders.
- Work with NHS RECONNECT to continue roll-out to ensure women leaving prison have dedicated point of contact to support them in engaging with NHS services.