



Ministry of
JUSTICE

Punishment and Reform: Effective Probation Services

Equality Impact Assessment – Initial
Screening

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Introduction

This Equality Impact Assessment (EIA) (initial screening) accompanies a consultation seeking views on how we can deliver more effective and efficient probation services.

The Government is committed to delivering better punishment and rehabilitation of offenders in order to protect the public. The task of managing offenders who receive community sentences or are released from longer periods in custody is the responsibility of probation services, and is integral to maintaining public safety. Much progress has been made in recent years and we recognise the high degree of professionalism and commitment shown by probation staff. However re-offending rates remain too high and are a burden on society.

We want to deliver more effective and efficient probation services and there is a clear case for change. Probation Trusts retain a near-monopoly on providing probation services, despite the intention of the Offender Management Act 2007 to introduce much greater competition. We are not making the best use of diverse providers from the public, private and voluntary sectors to help cut crime. We need to give providers further discretion and freedom over the design and delivery of services while holding them more strongly to account for reducing reoffending. Probation needs to respond to the changing organisation and structure of its key partners, such as the forthcoming introduction of Police and Crime Commissioners. Despite the savings of recent years, we believe probation can make further efficiencies, particularly in back office and management overheads, whilst protecting front-line services dealing with offenders.

This impact assessment accompanies a consultation seeking views on how we can reform probation services to more effectively and efficiently deliver our key outcomes of reducing reoffending, protecting the public and punishing and reforming offenders, including supporting our proposed changes to sentences in the community. The consultation document outlines our proposals to extend competition in probation services including in the management and supervision of lower risk offenders; introduce more diverse provision in probation services, on a payment by results basis where possible; strengthen the commissioning role of Probation Trusts; and strengthen the local delivery of probation services.

As the policy details are yet to be finalised this initial screening EIA identifies potential equality impacts on groups with protected characteristics and raises further questions which need to be explored. It is anticipated that until there is further engagement through consultation the impact on certain groups will not become fully apparent. Policy development is being informed by on-going consultation with key stakeholders and interested parties. This will allow us to improve our understanding of equality impacts as our policy develops.

We will develop and publish at a later date a full EIA once the Government's response to consultation and the preferred way forward is announced. This will identify the potential equality impacts of the proposed changes on a wide range of diverse groups; including, victims, offenders, staff and the general public. We will be mindful of direct and indirect impacts on recipients of services. It is envisaged that the full EIA will give recognition to the scale and pace of proposed change contained within the Probation Review and how this may impact on delivery of services to the public, organisational restructuring, new roles as potential commissioners, managing new and changing relationships with existing and new stakeholders.

This EIA (initial screening) is intended as a companion to the consultation document and the impact assessment (IA).

Equality Duties

Under the Equality Act 2010 section 149, when exercising its functions, Ministers and the Ministry of Justice are under a legal duty to have ‘due regard’ to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct under the Equality Act 2010;
- Advance equality of opportunity between different groups (those who share a protected characteristic and those who do not); and
- Foster good relations between different groups.

Paying ‘due regard’ needs to be considered against the nine “protected characteristics” under the Equality Act – namely race, sex, disability, sexual orientation, religion and belief, age, marriage and civil partnership, gender reassignment, pregnancy and maternity.

The MOJ, including NOMS, has a legal duty to investigate how policy proposals are likely to impact on the protected characteristics and where a potential disadvantageous effect is identified how that is either mitigated or justified by reference to the objectives of the policy. MoJ and NOMS also have a legal duty to advance equality of opportunity in the design and delivery of our policies and practices. MoJ and NOMS record the fulfilment of their duties by completing an Equality Impact Assessment (EIA).

Methodology

The full EIA will detail the methodology by which we will analyse the potential equalities impacts of the proposals contained in the consultation document.

Evidence Sources

We have reviewed the following:

- The Equality Strategy – Building a Fairer Britain HM Government December 2010
- Equality and Human Rights Commission Research report 68: Assessing local authorities' progress in meeting the accommodation needs of Gypsy and Traveller communities in England and Wales: 2010 update
- Lessons for Resettlement Coretta Phillips, London School of Economics May 2011 (Clinks)
- 'Promoting Equality in Prisons and Probation: the NOMS Single Equality Scheme 2009-2012'
- Positive Practice Positive Outcomes – A Handbook for Professionals in the Criminal Justice System working with Offenders with Learning Disabilities 2011 Edition
- National Offender Management Service Equalities Annual Report 2009-2010
- Supporting women offenders who have experienced domestic and sexual violence: Women's Aid Federation of England, 2011
- Thematic Inspection Report: Equal but different? An inspection of the use of alternatives to custody for women offenders A Joint Inspection by HMI Probation, HMCPSI and HMI Prisons 2011
- Ending Gang and Youth Violence: A Cross-Government Report November 2011
- <http://www.homeoffice.gov.uk/publications/crime/reducing-reoffending/IOM-Survey-Exec-Summary>
- Equality Act 2010
- Thematic Inspection Report: Putting the pieces together - An inspection of Multi-Agency Public Protection Arrangements. A Joint Inspection by HMI Probation and HMI Constabulary 2011
- Race Review 2008
- Understanding Commissioning Behaviours' March 2011, PwC
- Breaking the Cycle: Effective Punishment, Rehabilitation and Sentencing of Offenders December 2010
- The Corston Report March 2007
- The Bradley Report April 2009
- Offender Management Act 2007

Further evidence will be sought during the development of the full EIA. In addition we will undertake a review of available quantitative data as part of the consultation process to inform the full EIA.

Consultation and Engagement

We have undertaken initial engagement work with the following stakeholders;

- The Probation Association:
- Probation Chiefs Association
- Trade Unions
- Probation Chairs and Chief Executives of 12 Probation Trusts
- Women and Equalities Group (NOMS).

Throughout the consultation period we will expand the breadth of engagement with a wider group of stakeholders. These are currently being identified and will be approached as part of the consultation. We will ensure that this is communicated effectively so that the widest range of interested parties will respond.

Aims and outcomes for the policy:

The consultation document outlines our proposals for reforming the way that probation services are delivered which are intended to:

- Extend the principles of competition in probation services including to the management and supervision of lower risk offenders;
- Introduce more diverse provision in probation services, encouraging the participation of the public, private and voluntary sectors, and on a payment by results basis where possible;
- Strengthen the commissioning role of public sector Probation Trusts with a clearer focus on outcomes and to better meet local need;
- Strengthen the local delivery of probation services and consult on the potential over time for other public bodies to take responsibility for probation services.

Analysis

The following analysis sets out which groups may be affected by the policy proposals. Potential equality impacts remain to be determined as part of the consultation process and will depend on the final proposals. Through the consultation process and EIA, we will seek to identify the potential for any differential impacts and how we may mitigate against these and minimise the impact within the proposed changes.

Potential Age Impacts

The full EIA will identify the legislative requirements and explore the impact of any proposals on:

- older groups
- young adults
- those disproportionately under or over-represented within the criminal justice services
- barriers to accessing services

any other issues raised during the consultation process

Potential Age Impacts on victims

Probation Review: Equality Impact Assessment

Table 1 Proportion of adults who were victims of all BCS crime and personal crime by personal characteristics

Percentages	England and Wales, 2010/11 BCS		
	All BCS crime	Personal crime	Unweighted base
% victims once or more:			
ALL ADULTS	21.5	5.9	46,754
16-24	31.8	14.0	3,885
25-34	26.6	8.1	6,464
35-44	24.7	5.4	7,976
45-54	22.1	4.3	7,805
55-64	17.3	3.1	8,139
65-74	11.0	2.1	6,577
75+	7.8	1.4	5,908
Men	22.6	6.5	21,076
16-24	33.1	15.7	1,805
25-34	27.5	8.8	2,835
35-44	25.8	5.9	3,599
45-54	21.5	4.5	3,629
55-64	18.2	3.2	3,782
65-74	11.9	1.9	3,041
75+	8.6	0.8	2,385
Women	20.5	5.3	25,678
16-24	30.4	12.2	2,080
25-34	25.6	7.3	3,629
35-44	23.6	4.8	4,377
45-54	22.7	4.1	4,176
55-64	16.5	3.1	4,357
65-74	10.1	2.3	3,536
75+	7.2	1.9	3,523
Ethnic group			
White	21.1	5.6	42,991
Non-White	24.9	7.5	3,687
<i>Mixed</i>	29.5	10.8	350
<i>Asian or Asian British</i>	25.6	7.0	1,676
<i>Black or Black British</i>	22.7	6.9	1,006
<i>Chinese or other</i>	23.5	8.5	655
Marital status			
Married	18.8	3.3	21,755
Cohabiting	26.5	6.4	4,176
Single	27.9	11.6	9,828
Separated	24.4	7.7	1,560
Divorced	21.1	5.9	4,244
Widowed	9.2	2.5	5,173
Long-standing illness or disability			
Long-standing illness or disability	20.1	5.5	13,793
<i>Limits activities</i>	19.4	5.3	9,879
<i>Does not limit activities</i>	21.7	5.7	3,909
No long-standing illness or disability	22.0	6.0	32,883

Source:

Crime in England and Wales 2010/11

Table 1 shows that younger adults are at greatest risk of being a victim of overall crime.

Table 2 Proportion of children aged 10 to 15 who were victims of BCS personal crime once or more in the last year

Percentages	England and Wales, 2010/11 BCS	
	Preferred measure ¹	Broad measure ¹
All violence	7	12
Personal theft	5	6
Vandalism to personal property ²	0	2
All crime experienced by children aged 10-15	12	17
<i>Unweighted base</i>	<i>3,849</i>	<i>3,849</i>

1. The 'Preferred measure' takes into account factors identified as important in determining the severity of an incident (such as level of injury, value of item stolen or damaged, relationship with the perpetrator) while the 'Broad measure' counts all incidents which would be legally defined as crimes and therefore may include low-level incidents between children.

2. These offences are designated as 'household' offences for adults on the BCS (respondents reply on behalf of the household) but are presented here as 'personal' offences when the property stolen or damaged solely belonged to the child respondent. This broadens the scope of personal victimisation but may also result in double-counting of offences on the adult survey; the extent to which this happens will be evaluated in the future.

Source: Home Office Statistical Bulletin 10/11: Crime in England and Wales 2010/11: Findings from the British Crime Survey and Police Recorded Crime

Table 3 Proportion of children aged 10 to 15 who were victims of BCS personal crime once or more in the last year, by age group

Percentages	England and Wales, January to December 2009 BCS			
	All incidents that would be a crime in law		Incidents the victim perceived as a crime	
	Age 10 to 12	Age 13 to 15	Age 10 to 12	Age 13 to 15
Theft from the person	1	2	0	1
Other theft of personal property	5	5	2	3
All violence	21	19	3	4
All personal crime	18	17	5	7
<i>Unweighted base</i>	<i>1,733</i>	<i>1,928</i>	<i>1,733</i>	<i>1,928</i>

Source: Home office Statistical Bulletin 11/10: Experimental statistics on victimisation in children aged 10 to 15: Findings from the British Crime Survey for the year ending December 2009

Tables 2 and 3 present experimental statistics on crime against children aged 10 to 15. These are not directly comparable to the adult statistics because of differences in methods of data collection and definitions used. Comparing the year ending December 2009 BCS data across the two age groups provided, though, suggests that the likelihood of being a victim of crime is similar for younger children (aged 10 to 12) and older children (aged 13 to 15).

Potential age impacts on staff

Table 4: probation staffing profile according to age at 31/03/2011

Probation Service Staffing Figures by Age Bands - March 2011								
Age	<19	20-29	30-39	40-49	50-59	60+	Not Recorded	Total
	17	2576	4669	5206	4954	1229	1	18651
	%	%	%	%	%	%	%	%
	-	14%	25%	28%	27%	6%	-	100%

Source: These figures were collected from the probation trusts via the HR Data Warehouse, which is subject to the expected level of inaccuracy inherent in any large-scale administrative system. The probation trusts have the ability to resubmit historical data which may result in occasional variations in subsequent reports. The figures are shown to the nearest whole FTE, as a result of which the sum of the individual categories may differ slightly from the actual total.

Table 4 presents figures on the age profile of probation staff.

Potential age impacts on offenders

Table 5: Offenders commencing Community Orders and Suspended Sentence Orders

	18-20	21-24	25-29	30-39	40-49	50-59	60+
Males	19350	22927	22168	30287	30857	5224	1545
Females	2952	3253	3731	6136	3914	1006	161

Source: Offender Management Caseload statistics 2009

Table 5 presents the figures on the age profile of offenders starting Community Orders and Suspended Sentence Orders, they do not include those subject to supervision on licence.

The number of older offenders (60 and over) under Community Orders and Suspended Sentence Orders has increased year on year since 2005, with the greatest variation appears to be in the 30+ group. The data also shows a greater representation for female offenders in the 30-39 year age range compared to male offenders. These are examples of issues which will be explored further in the full EIA.

Potential Disability Impacts

The full EIA will identify the legislative requirements and explore the impact of any proposals on:

- physical disability
- learning disability
- mental health issues
- those disproportionately under or over-represented within the criminal justice services
- barriers to accessing services
- any other issues raised during the consultation process

Potential Disability Impacts on victims

Table 1 shows that the risk of being a victim of overall crime is slightly lower for people with a longstanding illness or disability than it is for those with no longstanding illness or disability; 19.4 per cent of adults with a limiting illness or disability had been a victim of all BCS crime in 2010/11 compared with 22 per cent of those with no longstanding illness or disability.

Potential disability impacts on staff

Table 6: Probation service staffing figures by disability

Probation Service Staffing Figures by Disability - March 2011					
Disability	No	Yes	Refused / Not Stated	Not Recorded	Total
	12406	1929	<i>n/a</i>	4317	18651
	%	%	%	%	%
	67%	10%	<i>n/a</i>	23%	100%

Source: These figures were collected from the probation trusts via the HR Data Warehouse, which is subject to the expected level of inaccuracy inherent in any large-scale administrative system. The probation trusts have the ability to resubmit historical data which may result in occasional variations in subsequent reports. The figures are shown to the nearest whole FTE, as a result of which the sum of the individual categories may differ slightly from the actual total.

Table 6 presents figures for 31st March 2011.

Potential disability impacts on offenders

Table 7: The extent, if any, an offender's health condition or disability limits their ability to carry out everyday activities

	Per cent
A great deal	14.0
To some extent	18.5
A little	10.6
Not at all	7.7
Total with a longstanding illness, disability, or infirmity of any kind	51.0
Don't Know	.0
Item not applicable	49.0
Total without a longstanding illness, disability, or infirmity of any kind	49.0
Total	100.0
<i>Unweighted base</i>	<i>2,595</i>

Source: Interim dataset for the first wave of the Offender Management Community Cohort Study

Note: this question is not based on the Equality Act 2010 definition of disability. There are a wide range of disabilities and illness included in the definition used at interview, including Problem with arms, legs, hands, feet, back or neck (including arthritis or rheumatism); Difficulty in seeing; Difficulty in hearing; Skin conditions, allergies; Chest, breathing problem, asthma, bronchitis; Heart, blood pressure or blood circulation problems; Stomach, liver, kidney or digestive problems; Diabetes; Depression, bad nerves; Mental illness or suffer from phobia, panics or other nervous disorders; Learning difficulties; Epilepsy; Other health problems or disabilities

Table 8: The proportion of offenders who feel they need help with a physical health condition or disability

	Per cent
No	85.6
Yes	14.3
Missing	0.1
Total	100.0
<i>Unweighted base</i>	<i>2,595</i>

Source: Interim dataset for the first wave of the Offender Management Community Cohort Study

Evidence from the recent Offender Management Community Cohort Study (OMCCS) suggests that a large proportion of offenders on community orders identify as having a long standing illness or disability. 51 per cent of the OMCCS sample stated that they had a longstanding illness, disability, or infirmity of any kind (Table 7, Annex A). It is a reasonable assumption that at least some of these people will be disabled under the Equality Act 2010. 33 per cent of the OMCCS sample stated that they had a health condition or disability that limits their ability to carry out everyday activities a great deal or to some extent (Table 7, Annex A), and 14 per cent of the OMCCS sample stated that they needed help with a physical health condition or disability (Table 8, Annex A).

Potential Gender Reassignment Impacts

The full EIA will identify the legislative requirements and explore the impact of any proposals on:

- those who identify themselves as reassigned male or female
- those who are undergoing gender reassignment
- those disproportionately under or over-represented within the criminal justice services
- barriers to accessing services
- any other issues raised during the consultation process

Potential Marriage and Civil Partnership Impacts

Table 1 show that single people have the highest risk of being a victim of overall crime (27.9 per cent). This is likely to reflect the younger age profile of this group.

Table 9: Marital status of offenders

Marital status	Per cent
Married	7.7
Living with a partner	17.5
Single, never married	59.0
Divorced	7.5
Separated	7.3
Widowed	.4
Other Specific	.6
Refusal	.0
Total	100.0
<i>Unweighted base</i>	2,595

Source: Interim dataset for the first wave of the Offender Management Community Cohort Study

Evidence suggests that a small proportion of offenders on community orders are married, with 8 per cent of the OMCCS sample stating that they were married (Table 9, Annex A).

Potential Pregnancy and Maternity Impacts

The full EIA will identify the legislative requirements and explore the impact of any proposals on:

- women within the workplace
- women offenders subject to community orders
- those requiring specialist services
- those disproportionately under or over-represented within the criminal justice services
- barriers to accessing services
- impact on children, partners and other family members
- any other issues raised during the consultation process

Potential Race Impacts

The full EIA will identify the legislative requirements and explore the impact of any proposals on:

- Black Minority Ethnic groups
- Gypsy and Traveller communities
- Asylum seekers, refugees/foreign nationals
- those disproportionately under or over-represented within the criminal justice services
- barriers to accessing services
- any other issues raised during the consultation process

Potential Race Impacts on victims

Table 1 shows that there are small differences in the risk of being a victim of overall crime by ethnic group, with 24.9 per cent of the Black and Minority Ethnic (BME) group reporting victimisation, compared to 21.1 per cent of the White ethnic group.

Potential Race impacts on staff

Table 10: Probation staffing profile according to ethnicity

Probation Service Staffing Figures by Ethnicity - March 2011					
Ethnicity	BME	White	Refused / Not Stated	Not Recorded	Total
	2643	15500	374	134	18651
	%	%	%	%	%
	14%	83%	2%	1%	100%

Source: These figures were collected from the probation trusts via the HR Data Warehouse, which is subject to the expected level of inaccuracy inherent in any large-scale administrative system. The probation trusts have the ability to resubmit historical data which may result in occasional variations in subsequent reports. The figures are shown to the nearest whole FTE, as a result of which the sum of the individual categories may differ slightly from the actual total.

Potential Race impacts on offenders

Table 11: Offenders supervised by the Probation Service, at end of period, under Community Orders and Suspended Sentence Orders by sentence type, ethnic group and sex, December 2010

	Missing ⁽¹⁾	White	Mixed	Asian or Asian British	Black or Black British	Chinese or Other ethnic group	Not Stated ⁽¹⁾
Males and Females							
Community order	1,227	76,073	2,594	4,085	5,418	1,212	1,155
Suspended sentence order	421	35,329	1,360	2,374	2,981	541	555

Source: Offender Management Caseload Statistics 2010

Potential Religion or Belief Impacts

The full EIA will identify the legislative requirements and explore the impact of any proposals on:

- individuals and groups whose religious adherence and/or beliefs need to be considered and accommodated
- barriers to accessing services
- those disproportionately under or over-represented within the criminal justice services
- any other issues raised by the consultation process

Potential Religion or Belief Impacts on victims

Table 12 Proportion of adults who were victims of crime by religion

Percentages	England and Wales, 2006/07 BCS			
	Violent crime	Personal crime	All BCS crime	Unweighted base ¹
Religion				46,975
Christian	3	6	23	37,482
Buddhist	3	5	20	244
Hindu	2	4	22	389
Muslim	4	7	27	879
Other	5	9	27	849
No religion	6	9	29	7,132

1. Unweighted base relates to 'Personal crime'.

Source: Home Office Statistical Bulletin 19/07: Attitudes, Perceptions and Risks of Crime: Supplementary Volume 1 to Crime in England and Wales 2006/07

Table 12 provides the most recent published data on the risk of being a victim of crime by religion from the 2006/07 BCS. There are differences in the risk of being a victim of violent crime by religious group.

Potential Sex Impacts

The full EIA will identify the legislative requirements and explore the impact of any proposals on:

- different gender needs/requirements
- barriers to accessing services
- those disproportionately under or over-represented within the criminal justice services
- any other issues raised by the consultation process

Potential Sex Impacts on victims

Table 1 shows that men are slightly more likely to be a victim of overall crime than women (22.6 per cent compared to 20.5 per cent).

Potential sex impacts on staff

Table 13: Probation staffing profile according to gender

Probation Service Staffing Figures by Gender - March 2011					
Gender	Female	Male	Refused / Not Stated	Not Recorded	Total
	13042	5608	1	n/a	18651
	%	%	%	%	%
	70%	30%	-	n/a	100%

Source: These figures were collected from the probation trusts via the HR Data Warehouse, which is subject to the expected level of inaccuracy inherent in any large-scale administrative system. The probation trusts have the ability to resubmit historical data which may result in occasional variations in subsequent reports. The figures are shown to the nearest whole FTE, as a result of which the sum of the individual categories may differ slightly from the actual total.

Potential Sex Impacts on Offenders

Table 14: Offenders supervised by the Probation Service, at end of period, under Community Orders and Suspended Sentence Orders by sentence type, ethnic group and sex, December 2009

Females	Males
26125	210643
11%	89%

Source: Offender Management Caseload Statistics 2009

Table 15: Offenders supervised by the Probation Service, at end of period, under Community Orders and Suspended Sentence Orders by supervision tier and sex, at end of period, December 2010, England and Wales

	Tier 1	Tier 2	Tier 3	Tier 4	Not Stated	Total
Males and Females						
Community order	27%	25%	43%	4%	0%	100%
Suspended sentence order	21%	27%	47%	5%	0%	100%
Males						
Community order	27%	23%	44%	5%	0%	100%
Suspended sentence order	21%	25%	48%	6%	0%	100%
Females						
Community order	27%	39%	32%	2%	0%	100%
Suspended sentence order	24%	37%	36%	2%	0%	100%

Source: Offender Management Caseload Statistics 2010

The indicative tiering profile presented in Table 15 shows that the same proportion of men and women are in Tier 1 and that a greater proportion of women are in Tier 2.

Potential Sexual Orientation Impacts

The full EIA will identify the legislative requirements and explore the impact of any proposals on:

- lesbian, gay, bi-sexual, transgendered and heterosexual groups
- barriers to accessing services
- those disproportionately under or over-represented within the criminal justice services
- any other issues raised by the consultation process

Potential Sexual Orientation Impacts on victims

Table 16 Proportion of adults who were victims of intimate violence by sexual orientation

Percentages	England and Wales, 2007/08 and 2008/09 BCS				
	Domestic abuse ¹		Unweighted base		
	Men	Women	Men	Women	
Sexual Orientation			22,109	26,154	93816
Heterosexual/straight	4	6	20,892	24,795	83568
Gay or bisexual	9	17	512	473	4608
Don't know/Don't wish to answer	8	7	705	886	5640

1. Only covers victims aged 16-59. This data excludes stalking as questions on stalking were not included in the 2007/08 BCS.

Source: Home Office Statistical Bulletin 01/10: Homicides, Firearms offences and Intimate Violence 2008/09: Supplementary Volume 2 to Crime in England and Wales 2008/09

Due to the relatively small number of respondents to the BCS who identify themselves as gay, lesbian or bisexual, data from the 2007/08 and 2008/09 BCS have been combined for the purposes of analysis and are given in Table 16. This shows that more lesbian/gay or bisexual people reported experiencing any domestic abuse in the past year than heterosexual/straight people.

Next Steps

This EIA (initial screening) has begun to identify some of the potential issues which will need to be addressed in a full EIA. The consultation period will identify additional challenges and we will explore these in greater detail. The full EIA will be the locus of a response to the issues raised by a wide range of stakeholders to ensure that equality impacts are integrated into the development of any proposed changes. To enable us to identify and address any potential equality impacts, we will:

- gather information during the consultation process to inform the full EIA
- build upon the engagement work which has begun with key stakeholders over the past twelve months
- conduct a full review of the available research relating to the issues relevant to the Probation Review
- adopt an integrated approach to the development of the equality impacts of the proposed policy which will inform decision making within NOMS/MOJ
- continue to consult and collaborate with the NOMS Women's and Equalities group and other partners