

Committee on the Rights of the Child
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Dear friends

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Submission to the United Nations Committee on the Rights of the Child on the UK government's compliance with the UNCRC

About us

Founded in 1866, the Howard League is the oldest penal reform charity in the world and is the leading non-governmental organisation dealing with penal reform in the United Kingdom. It was awarded special consultative status with the United Nations in 1947.

The Howard League provides an expert legal service for children and young adults in prison (under 21). As the only national service dedicated to representing this age group of prisoners, in both custody and on their release to the community, we are uniquely positioned to advise on how to improve outcomes for this vulnerable group. We are an independent charity which accepts no grant funding from the UK government.

Summary of concerns

While the number of children in prison has reduced significantly, those that find themselves in prison are spending longer inside. There are grave concerns about the number of children who have taken their own lives in prison, as well as concerns about the increasing use of punitive measures such as solitary confinement and the use of force. Following cuts to legal aid, implemented in December 2013, children in prison are no longer eligible for legal aid to help with most issues affecting them in prison.

Prison as a measure of last resort and for the shortest appropriate period of time

The number of children formally involved in the youth justice system in England and Wales has reduced. The number of first time entrants to the youth justice system has fallen to 22,393 in 2013/14, a fall of 75 per cent compared to 10 years ago and a fall by 20 per cent compared to the previous year. The number of children sentenced to immediate custody has fallen by 21 per cent from 2,815 in 2012/13 to 2,226 in 2013/14. This number has fallen by 65 per cent since 2003/04. The average custody population has reduced by 21 per cent in the last year, to an average of 1,216.¹

¹ <https://www.gov.uk/government/statistics/youth-justice-annual-statistics-2013-to-2014>

However, this progress needs to be considered in light of the extremely high starting point: the number of children in prison increased by 795 per cent from 1989 to 2009. At 10, England and Wales still has the lowest age of criminal responsibility and highest level of child incarceration in Western Europe.

The average length of time spent in prison by children on average has increased from 85 days in 2012/13 to 90 days in 2013/14. For children serving long term sentences², the average time increased from 302 days to 409 days.³

While adults are not subject to 'minimum' terms of imprisonment, children serving Detention and Training Orders are detained for a minimum of four months. Children can also be given life sentences, which are mandatory for murder and discretionary for other serious violent or sexual offences. After a specified minimum term, the child will be eligible for a review by the parole board, who consider release or a transfer to open conditions – despite the fact that no open conditions exist for children in England and Wales. The licence period is indeterminate. There is no option to apply to cancel the licence altogether, although there is provision for the conditions to be reduced significantly. The child will be subject to administrative recall for the rest of his or her life.

Remand

The new remand framework in the Legal Aid, Sentencing and Punishment of Offenders (LASPO) Act 2012 came into force in December 2012. This replaced the framework for remand of children in the Children and Young Persons Act 1969 and removed the provision under which 17 year olds were treated as adults for remand purposes, which meant they could only be detained in young offender institutions (YOIs).

Children aged 10 and 11 may only be remanded on bail or to a secure children's home. Other children may only be remanded to youth detention accommodation in accordance with section 102 of LASPO if a set of conditions set out in section 98 or 99 are met.

Under section 98:

- The child must be at least 12;
- At least one offence must be a violent or sexual offence or be punishable in the case of an adult with imprisonment for a term of 14 years or more;
- The court must consider that only such a remand would be adequate to protect the public from death or serious personal injury occasioned by further offences or to prevent the commission by the child of imprisonable offences ("the necessity condition");
- And the child must either be legally represented before the court or unrepresented for one of the specified reasons ("the first or second legal representation condition").

Section 99 of the act applies if the child faces a realistic prospect of receiving a custodial sentence. In these circumstances, if they have or alleged to have committed an offence while on remand in custody and have a recent history of absconding while on remand, or, alternatively, the offence forms part of a recent history of committing imprisonable offences while on remand (on bail or in custody) then they may be remanded securely pursuant to this section. The child must be at least 12 and the "necessity" and "legal representation" conditions must be satisfied.

Despite this legislative change, which was designed to reduce the number of children held on remand, 1,930 children were remanded to custody in 2013-14, accounting for 21 per cent of the

² Under section 90 and 91 of the Powers of Criminal Courts (Sentencing) Act 2000 and section 226B of the Criminal Justice Act 2003

³ <https://www.gov.uk/government/statistics/youth-justice-annual-statistics-2013-to-2014>

average custodial population. Of these, 62 per cent were not given a custodial sentence (25 per cent were acquitted).⁴

Minority groups

Although there has been a welcome reduction in the number of children in prison in recent years, the number of white boys has reduced at double the rate compared to the number of BME (black and minority ethnic) boys. BME children now account for 41 per cent of the total child prison population.⁵

In the latest survey of children in custody, black and minority ethnic boys reported a poorer experience than white boys in a range of areas, including:

- Their experience during transfer to the YOI and in reception
- Their first few days
- Staff relationships
- Food and canteen
- Applications and complaints
- Behaviour management – they were less likely to feel they had been treated fairly in the rewards scheme and more likely to report having had an adjudication, having been physically restraint (45 per cent compared with 34 per cent) and having spent a night in the segregation unit.
- Health services
- Activities
- Keeping in touch with family
- Preparation for release⁶

The experience of other minority groups and those with protected characteristics are also poorer across the board. HM Inspectorate of Prisons has raised concerns in recent inspections:

“Boys who considered themselves to have a disability reported more negatively than others in some important areas in our survey. For example, a third of respondents said that they felt unsafe at the moment, 52 per cent said that they had been victimised by other boys and 33 per cent by staff.”⁷

“Two boys with physical disabilities who spoke to us referred to a lack of systematic care or care plans, no named member of staff to turn to and many practical problems arising from their disability. One boy with memory loss arising from an accident could not remember to complete applications or visits orders. Another felt unsafe during movement from education classrooms. There was no disability liaison officer or disability forum, and the boys we spoke to did not know who their personal officers were.”⁸

“Only 61 per cent of Muslim boys said they were treated with respect by staff against the comparator of 93 per cent, and 46 per cent of Muslim boys said they had felt unsafe in the

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/399379/youth-justice-annual-stats-13-14.pdf

⁵ <https://www.gov.uk/government/statistics/youth-custody-data>

⁶ <https://www.justiceinspectorates.gov.uk/hmiprison/wp-content/uploads/sites/4/2014/12/HMIP-Children-in-custody-2013-14-web.pdf>

⁷ <https://www.justiceinspectorates.gov.uk/hmiprison/wp-content/uploads/sites/4/2015/06/Wetherby-web-2015.pdf>

⁸ <https://www.justiceinspectorates.gov.uk/hmiprison/wp-content/uploads/sites/4/2014/10/Cookham-Wood-Web-2014.pdf>

establishment compared with 21 per cent of non-Muslim boys. There was no evidence that these concerns had been identified and addressed.”⁹

“Boys who had been in care reported a poorer experience of behaviour management procedures. They were less likely to report being on the enhanced level of the reward scheme or to feel the levels motivated them to change their behaviour. They were more likely to say they had had an adjudication, that they had been physically restrained (46 per cent compared with 34 per cent of boys who had not been in care) and that they had spent a night in the care and separation unit.”
“A higher proportion of boys who had been in care said they had felt unsafe at the YOI at some point. They were twice as likely to report that other boys and staff had made insulting remarks about them and that shouting through the windows was a problem.”¹⁰

Right to life

Children’s prisons are failing in their most basic duty to keep the children in their care safe. Three children have taken their own lives in prison since 2010. These were the first deaths since 2007.

- Ryan Clarke, aged 17, died at Wetherby prison in April 2011. The jury at his inquest concluded that Ryan’s actions were more of a ‘cry for help’ rather than intentional hanging, and ruled by majority that his death was accidental.¹¹
- Jake Hardy, aged 17, died in hospital having been found hanging in his cell at Hindley prison in January 2012. The jury at his inquest concluded that a series of 12 individual failures more than minimally contributed to his death and that his decision to hang himself could have been prevented.¹²
- Alex Kelly, aged 15, died in hospital having been found hanging in his cell at Cookham Wood prison in January 2012. The jury at his inquest concluded that numerous failures led to Alex’s death and that he took his own life, but his intention at the time cannot be proven beyond reasonable doubt.¹³

In 2013 the Prison and Probation Ombudsman (PPO), which is one of the statutory bodies of the UK’s National Preventative Mechanism (NPM), published a ‘lessons learnt’ report into these three deaths. Key findings included:

- Children had been inappropriately placed in prisons against the recommendations of youth offending teams (YOTs) that they should be in smaller, more specialist units.
- Once in the prisons, two of the boys continued to show signs of extreme vulnerability including withdrawing from social contact and self-harm.
- Two of the children were looked after children and the third had a statement of special educational needs. Two were in custody for the first time; the other had only spent a brief period in prison on remand. These are known static risk factors for self-harm. Yet, there were inconsistencies in the assessment and evaluation of the risk these children posed to themselves.
- All three children entered custody with previously diagnosed mental health conditions, which were not adequately catered for.
- There were issues with poor assessments, missed medication and a lack of an escalation in mental health support provided, despite acts of self harm and concerns being raised by staff.

⁹ <https://www.justiceinspectorates.gov.uk/hmiprisons/wp-content/uploads/sites/4/2014/10/Cookham-Wood-Web-2014.pdf>

¹⁰ <https://www.justiceinspectorates.gov.uk/hmiprisons/wp-content/uploads/sites/4/2014/12/HMIP-Children-in-custody-2013-14-web.pdf>

¹¹ <http://inquest.org.uk/media/pr/serious-failures-identified-by-jury-inquest-17-year-old-ryan-clark-wetherby>

¹² <http://www.inquest.org.uk/media/pr/jury-rules-failures-preventable-death-17-year-old-jake-hardy-hindley-prison>

¹³ <http://inquest.org.uk/media/pr/jury-returns-critical-findings-in-the-inquest-into-the-death-of-15-year-old>

- There is evidence that two of the children were bullied, yet the investigations found that staff were aware of, or suspected, this bullying, but there was a lack of a robust response.
- There was a lack of a consistent and reliable staff presence.

The PPO concluded that:

*'Many of the issues raised by the three recent deaths are not unique. The impact of bullying, weaknesses of reception assessments of vulnerability and mental health, weaknesses of personal officer schemes and problems with ACCTs¹⁴ have been identified in our past investigations of child deaths between 2004 and 2007.'*¹⁵

34 children have died in prison since 1990. However, the government has consistently refused to undertake a large scale public inquiry into how such deaths of children could be prevented, and explicitly excluded them from the scope of the 'Harris Review', which has been set up to independently review the deaths of young adults in prison.¹⁶

Use of force

Deaths, serious injuries and concerns about the improper use of restraint have led to inquests, inquiries and reviews of how we treat children. In 2006 the Howard League published the report of an independent inquiry it had commissioned from the Lord Carlile of Berriew QC which investigated the use of physical restraint, solitary confinement and forcible strip-searching of children in prisons, secure training centres and secure children's homes. Lord Carlile recommended that restraint should never be used to secure compliance and that there should be one certified physical intervention technique that was safe for children. He concluded that resort to restraint was a failure to de-escalate conflict and the infliction of pain was not acceptable and may be unlawful.¹⁷

Although the number of use-of-force incidents has reduced in children's prisons, the rate per 100 children in prison has more than doubled in the last five years. The latest annual youth justice statistics, published in January 2015, show that there were 5,714 incidents of restraint in the secure estate in 2013/14, down by 12 per cent on the previous year. However, the number of restraints per 100 children increased to 28.4 from 23.8 in the previous year.¹⁸

There were 120 injuries suffered by children as a result of the use of force in 2013/14. 1,060 injuries were caused as a result of the use of force between 2009-14, 61 of which were classified as 'serious injury requiring hospital treatment'.¹⁹

In July 2012 the government announced a new system of restraint for use in children's prisons: 'Minimising and Managing Physical Restraint' (MMPR). Implementation in YOIs began in January 2014 and it will be rolled out across the estate by the end of 2015. However, there are some key concerns with the new system.

Pain

There are three techniques that cause the deliberate infliction of short bursts of pain on children. The Restraint Advisory Board (RAB), who advised the government on the new system of restraint, reported that they were not able to consider a system of restraint that involved no pain-

¹⁴ Assessment, Care in Custody and Teamwork is the prison management system for those identified at risk of self-harm and suicide

¹⁵ http://www.ppo.gov.uk/wp-content/uploads/2014/07/LLB_FII_03_Child_deaths.pdf#view=FitH

¹⁶ <http://iapdeathsincustody.independent.gov.uk/harris-review/>

¹⁷ https://d19y1po4aovc7m.cloudfront.net/fileadmin/howard_league/user/pdf/Publications/Carlile_Report_pdf.pdf

¹⁸ <https://www.gov.uk/government/statistics/youth-justice-annual-statistics-2013-to-2014>

¹⁹ Ibid

inducing technique and that this 'had a number of practical implications for and placed limitations upon RAB's work'.²⁰

Good order and discipline

In 2008, the Court of Appeal found that the use of force for 'good order and discipline' (GOAD) (to get children to do what they are told), was illegal as it amounts to "cruel, inhuman or degrading treatment".²¹ As such, its use must be *necessary* to comply with the European Convention on Human Rights (ECHR). The judgment ruled that permitting the use of force for GOAD does not limit it to situations where it is necessary and so violates the ECHR. Further, the Court of Appeal found that the use of force for GOAD is also not necessary as secure children's homes operate without it.

The first, and thus far only, set of data on MMPR showed that the use of force for GOAD accounted for between 20-28 per cent of total incidents of use of force in YOIs.

Head hold

In 2011 the RAB raised significant concerns regarding the 'head hold' technique:

"This form of restraint was considered by RAB to have some inherent potentially serious risks even when applied with complete accuracy, and to be too easily misapplied by staff...with relatively small, inadvertent errors nonetheless carrying further risk of serious harm. The margin of safety was considered too small."

In response, the YJB committed to undertake a review of the safety technique. This is still not complete.²²

According to the initial data on MMPR, the head hold was used between 19-25 per cent of times when force was used on children.²³

The Independent Restraint Advisory Panel reported in 2014 that children had suffered from petechial rashes (haemorrhages) following being subjected to the head hold. Further, concerns were raised *"about the potential to misapply the head hold, and, in particular, about how easy it is to pull a young person's head forward rather than merely guide it while he or she is being restrained. This could result in the restrained person's head being held too low and that might, in turn, risk compressing his or her chest area and/or raise the risk of staff misapplying the trigger hold to the neck rather than to the chin."*²⁴

Handcuffs

MMPR permits the use of handcuffs whilst a child is being restrained. The initial data showed that handcuffs were used between 14-19 per cent of times when force was used on children.

HM Inspectorate of Prisons repeatedly raises concerns regarding the use of force.

"The incidence of use of force had increased sharply – the rate over the previous six months was 79 per cent higher than the same period at the last inspection. On 41 per cent of these occasions, control and restraint techniques had been used.... The fact that in our survey 57 per cent said that they had been physically restrained in the last six months (against 38 per cent at

²⁰ Restraint Advisory Board (2011) Assessment of minimising and managing physical restraint (MMPR) for children in the secure estate: report to the Restraint Management Board, Ministry of Justice, London

²¹ <http://www.bailii.org/ew/cases/EWCA/Civ/2008/882.html>

²² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/368350/minimising-and-managing-physical-restraint-data-collection.pdf

²³ <https://www.gov.uk/government/statistics/mmpr-data-march-2013-to-march-2014>

²⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/368626/irap-mmpr-final-report-2014.pdf

the last inspection and the comparator of 36 per cent) suggested that the increase went further than a few individuals.”²⁵

“Use of force was high and had increased since the previous inspection. The use of full control and restraint techniques had also increased slightly. There had been 282 incidents of use of force in the previous six months compared to 250 at our last inspection....Staff acknowledged that they used infliction of pain through wrist locks to gain compliance, which was inappropriate. Only one instance had been referred to the safeguarding team for further investigation.”²⁶

“Use of force had increased since our last inspection and was higher than in comparator establishments. MMPR had been fully implemented. There had been 352 incidents of use of force in the previous six months compared to 316 at our last inspection. Pain compliance had been used on at least 19 occasions, almost double the level at the previous inspection, including the use of the mandibular angle technique. Use of pain compliance was inappropriate with this age group and no incident had been referred to the safeguarding team for investigation. Not all video recordings of planned incidents had been retained, although the prison had retrieved CCTV coverage for many spontaneous incidents.”²⁷

Solitary confinement – restricted regimes

Staff shortages and an increase in violence inside children’s prisons have led to ‘restricted regimes’ being imposed. In some prisons, these restrictions have been across the entire institution. At Cookham Wood prison:

“In late March, staff shortages forced the introduction of a restricted weekend and evening regime, reducing association time. This restricted regime was very regrettable but fair and predictable. Increasingly, however, from April to July, additional shut downs were required, not only in the evenings and weekends but also, on occasions, during the core day.”²⁸

Further, inspectors found that:

“As a direct result of staff shortages and with the introduction of a restricted regime, time out of cell had deteriorated since our last inspection. Children now only received association on alternate days. If fully occupied, some boys could still have over nine hours out of cell during a weekday, reducing to over seven at weekends. However, this could be as low as two hours for the minority who were not fully engaged with the regime. Children were not given enough time in the open air and limited activities were available during exercise.”²⁹

Prisons have also increasingly used restricted regimes to manage individual children, which includes locking them in their cells for 23 hours a day. The inspection of Feltham prison found that 26 per cent of the children being on restricted regimes, which meant that they “were in effect experiencing solitary confinement on their residential units”. In addition, it “undermined relationships, stability and the normal routines of the institutions, such as access to amenities, learning and skills or work.”³⁰

At Wetherby prison, “most boys could have seven to eight hours unlocked during weekdays and about six at weekends, which was slightly less than we reported previously. However, it was much less for the significant minority on different restricted regimes, who could have as little as

²⁵ <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2015/01/Feltham-A-CYP-web-2014.pdf>

²⁶ <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2014/10/Cookham-Wood-Web-2014.pdf>

²⁷ <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2015/06/Wetherby-web-2015.pdf>

²⁸ <http://www.imb.org.uk/wp-content/uploads/2015/01/cookham-wood-2013-14.pdf>

²⁹ <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2014/10/Cookham-Wood-Web-2014.pdf>

³⁰ <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2015/01/Feltham-A-CYP-web-2014.pdf>

*an hour a day unlocked. Roll checks during the middle of the core day showed about 30% of the population locked in their cells.*³¹

Solitary confinement – segregation units

In addition to the increasing use of 'restricted regimes', children are also held in solitary confinement in prison segregation units.

There is no central data on the number of children placed in segregation units, the length of confinement or reasons for confinement. However, the latest survey of children in prison found that 28 per cent had been held in segregation at some point.³² Children spent 7,970 days in prison segregation units in 2013/14.³³

HM Chief Inspector of Prisons has stated that: *"Conditions for children in segregation units were poor and they were locked up for far too long."*³⁴

- At Feltham prison, 394 children were put on the segregation unit in the last year. One child was held there for 39 days.³⁵
- At Cookham Wood prison, *"at one time during the period when staff were able to deliver little more than the basic care"* five children were held in segregation between 98-168 days.³⁶
- At Wetherby prison, inspectors found that one child had been segregated for 66 days and another two boys for 46 days.³⁷

The regimes on segregation units are limited, such as at Wetherby prison, where inspectors found:

*"The regime on the unit was inadequate. All the boys we spoke to told us they spent most of their time locked in their cells. There was little evidence of any constructive activities, although staff sometimes allowed boys out of their cells to carry out cleaning work on the unit."*³⁸

This issue has been exacerbated with an increase of children held on segregation units as prisons have become less safe. At Cookham Wood prison, independent monitors reported that during 2014:

*"An increase in the number of young people on GOOD, following violent and challenging behaviour, resulted in the reopening in the old building of Beech 1 as an extension to the Phoenix (care and separation) unit. Staffing on the unit (capacity 7 young people) remained at the same level when up to 17 young people were accommodated. This resulted in a reduction in the time available to work with the young people and ensure access to daily exercise."*³⁹

Further, the physical environment of segregation units has been an ongoing issue. At Wetherby prison:

³¹ <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2015/06/Wetherby-web-2015.pdf>

³² <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2014/12/HMIP-Children-in-custody-2013-14-web.pdf>

³³ <http://www.theyworkforyou.com/wrans/?id=2014-11-04.213432.h&s=7%2C970#p213432.r0>

³⁴ https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2014/10/HMIP-AR_2013-141.pdf

³⁵ <http://data.parliament.uk/DepositedPapers/Files/DEP2015-0074/216277-216278-216279-216280-216281-IWW.PDF>

³⁶ <http://www.imb.org.uk/wp-content/uploads/2015/01/cookham-wood-2013-14.pdf>

³⁷ <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2014/06/Wetherby-2013.pdf>

³⁸ <https://www.justiceinspectorates.gov.uk/hmiprisonswp-content/uploads/sites/4/2015/06/Wetherby-web-2015.pdf>

³⁹ <http://www.imb.org.uk/wp-content/uploads/2015/01/cookham-wood-2013-14.pdf>

“The CSU [segregation unit] facility is woefully inadequate and as documented in Annual IMB Reports 2010, 2011, 2012 and 2013 it remains unfit for purpose. In 2010 HM Chief Inspector of Prisons reported “Little has changed in the physical environment of the CSU and conditions were generally poor. Communal areas remain stark and cells were small, cramped and poorly ventilated.” In 2014 The Board can regrettably repeat that this is still the case.”⁴⁰

Adjudications

When children break the rules inside prisons, they may be dealt with by way of a hearing that mirrors the criminal justice process outside of prisons and which is known as an adjudication. Most are heard by a prison governor acting as the internal adjudicator who has wide powers to impose punishments within the prison. They can also be heard by an Independent Adjudicator – usually a local district judge – who has the power to impose additional days of imprisonment on children.

Although the number of adjudications has fallen, the rate of adjudications per 100 children has increased. There have been 49,073 adjudications in children’s prisons in the last five years.⁴¹

63 per cent of children in prison have had at least one adjudication in the last year.⁴²

Strip-searching

As a consequence of successful lobbying by the Howard League⁴³, the government ended the practice of routine strip-searching on reception at children’s prisons in May 2014.⁴⁴ Strip-searching of children in prison can now only occur following a risk assessment.

Risk-led strip-searching had been introduced in all other areas of prisons in April 2012.⁴⁵

Access to justice

Drastic cuts to the availability of legal aid for prisoners were introduced under the Legal Aid, Sentencing and Punishment of Offenders Act 2012 and implemented in December 2013.

The Joint Committee on Human Rights reported concerns in December 2013 about the difficulties children in prison might face in the absence of legal aid for most problems they face:

“We do not agree that advocacy services and internal prison complaints systems will be able to deal with these cases effectively. This could leave young people vulnerable and deny them their rights. The issues concerning young people may involve matters of housing law, social care law and public law of such complexity that they require access to legal advice and assistance in order to investigate and formulate their case. The availability of such funding in appropriate cases would be in accordance with the UNCRC.”⁴⁶

Evidence gathered by the Howard League through its free helpline for children and young people indicates that the Committee’s concerns were valid. In 2014, the year following the implementation of the cuts, calls to our legal helpline increased by one third. The problems faced by children in prison accessing legal help are in line with the difficulties faced by all young people in accessing justice.⁴⁷

⁴⁰ <http://www.imb.org.uk/wp-content/uploads/2015/01/wetherby-2013-2014.pdf>

⁴¹ <https://www.gov.uk/government/statistics/offender-management-statistics-quarterly-october-to-december-2014-and-annual>

⁴² <https://www.justiceinspectorates.gov.uk/hmiprisoners/wp-content/uploads/sites/4/2014/12/HMIP-Children-in-custody-2013-14-web.pdf>

⁴³ http://www.howardleague.org/fileadmin/howard_league/user/pdf/Letters/Letter_to_Jeremy_Wright.pdf

⁴⁴ <https://www.justice.gov.uk/downloads/offenders/psipso/psi-2014/psi-16-2014-searching-young-people.pdf>

⁴⁵ <https://www.justice.gov.uk/offenders/psis/prison-service-instructions-2012>

⁴⁶ <http://www.publications.parliament.uk/pa/jt201314/jtselect/jtrights/100/10002.htm>

⁴⁷ <http://www.justrights.org.uk/sites/default/files/Justice%20for%20young%20a%20snapshot.pdf>

If you require any further information, please do not hesitate to get in touch.

Yours sincerely

Frances Crook

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