



**Consultation response from The Royal College of Speech and Language Therapists NI to
“Empowering Change in Women’s Lives’ Strategy for supporting and challenging women and girls
in contact with the justice system” – a proposed framework.**

19 March 2021

Q1 Are there any key facts, figures and trends that are missing?

- Yes
No

- ❖ Yes. Key information should be included in relation to the high prevalence of communication difficulties among people who offend, including women and girls, as these needs are relevant to many of the priorities and actions outlined in the document.

Q2 If yes, please provide a brief description of what is missing (and a source if available)

The RCLST recommend:

- the inclusion of a key fact / figure around the prevalence of communication difficulties within the section entitled ‘Presenting vulnerabilities’ (pg. 5), such as those provided below
- the inclusion of communication needs within the list of types of complex and conflicting needs (pg. 9) women and girls may experience through the insertion of: *They are more likely to have undetected communication needs which may affect their ability to participate in the criminal justice process and access programmes and support.*

EVIDENCE / SOURCES

Why are communication needs relevant to women and girls in the justice system?

- ❖ Individuals in the justice system, including women and girls, are more likely to have significant speech, language and communication needs compared to the general population¹. Substantial local and international evidence indicates 60% of young people who offend will have significant and undetected communication needs², compared with around 10% of the general population.

¹ Coles, H, Gillett, K, Murray, G, Turner, K (2017) ‘The Royal College of Speech and Language Therapists Justice Evidence Base Consolidation’ available here: <https://www.rcslt.org/wp-content/uploads/media/Project/RCSLT/justice-evidence-base2017-1.pdf>

² Bryan, K. et al. (2015). Language difficulties and criminal justice: the need for earlier identification. *International Journal of Language and Communication Disorders*, 50(6), 763–775.

- ❖ This high prevalence of communication needs is reflected in several small-scale pilot programmes involving women and girls in contact in NI:
 - A sample screening of the population at Hydebank Wood College in 2018 found that 75% of the women screened had significant and undetected speech, language and communication needs – (Source: SLT, Healthcare in Prison Team, SET).
 - Between December 2020 and March 2021 23 new female committals to Hydebank Wood College were booked for SLCN screening and 12 have attended; 67 % of the females screened presented with communication difficulties³. (Source: SLT, Healthcare in Prison Team, SET).
 - Ongoing screening of 39 children in residential care in the western trust which included nine girls, found that 66% of the girls screened presented with significant communication difficulties, more than half of these girls had contact with the Youth justice, PSNI and Juvenile Justice Centre. (Source: SLT Service, Western Health Social Care Trust)

- ❖ SLCN are often referred to hidden needs as behaviour can mask the underlying difficulties. As such, there is a need for SLT to be an integral part of services for females involved with the justice system from early intervention through to custody and reintegration.

“One young woman received a diagnosis of autism at almost 18 years old. She had many services including CAMHS, Social Work, alternative education placements prior to this (SLT assessment) and although there were concerns noted, speech, language and communication weren’t considered. I think this demonstrates that these issues can be even more hidden in girls and young women”. SLT, Residential Team, WHSCT

- ❖ Whilst the total number of women and girls involved the above studies is small, both in absolute terms and also in relation to the numbers of men, it is vital to recognise that the incidence of communication needs among women and girls involved in criminal justice remains significantly higher than the general population, which this has important implications for this strategy.

Why are women and girls in the justice system are at higher risk of communication difficulties?

- ❖ Communication difficulties may be linked to an underlying condition such as autism, or a learning disability, or linked to a mental health condition, which high numbers of women in criminal justice experience. The Bradley Report (2010)⁴ which focussed largely on mental health and learning disabilities in prisons emphasised the need for early identification of speech, language and communication needs, describing SLCN as one of the factors that would need to be addressed in order to negate anti-social behaviour but also continued contact with the criminal justice system.

³ (Source: SLT, Healthcare in Prison Team, SET).

⁴ The Bradley Report (2010) available at https://webarchive.nationalarchives.gov.uk/20130105193845/http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_098698.pdf

- ❖ Communication difficulties may also be as a result of a stand-alone communication disability, such as a stammer but may also be linked to the effects of some of the adverse childhood experiences that are discussed in the strategy including poverty, trauma, neglect and domestic violence abuse.
- ❖ Children and young people who have had very negative early experiences often find it difficult to interact effectively with others, so they miss out on opportunities to develop their positive language and social interaction skills and this can have a lasting impact into adulthood:
 - In areas of social disadvantage around 50% of children start school with delayed language and other identified communication needs^{5, 6}.
 - Children in abusive or neglectful situations are less likely to develop secure attachments to their care givers which can lead to difficulties in social communication, reduced language skills, an impaired ability to feel and express emotions, and a limited vocabulary for thoughts and feelings⁷.
 - High-risk young people, such as those who are subject to child protection orders because of suspected or confirmed maltreatment, face an elevated risk of communication needs⁸.
 - Maltreated children are likely to have poor language and social communication skills⁹. Flashbacks and chronic stress shut down language areas and language skills may be diminished or lost in the longer term¹⁰.
 - 81% of children with emotional and behavioural disorders have significant language deficits¹¹.

What is the impact of communication difficulties for women and girls in the criminal justice system?

- ❖ Communication difficulties and disability have a great impact upon every process within the legal and judicial system as there are huge demands placed on language throughout the justice system and these difficulties affect a person's ability to fully participate at every stage of the CJS.
- ❖ Some of the types of SLCN experienced by individuals in the justice system include:

⁵ Locke, A., Ginsborg, J. & Peers, I. (2002) Development and Disadvantage: implications for early years International Journal of Language and Communication Disorders Vol 37:1.

⁶ Law, J., McBean, K and Rush, R. (2011) Communication skills in a population of primary school-aged children raised in an area of pronounced social disadvantage International Journal of Language and Communication Disorders, 46, (6) pp 657–664.

⁷ Sadiq F. A. et al. (2012). Social use of language in children with reactive attachment disorder and autism spectrum disorders. *Eur Child Adolesc Psychiatry*. 21: 267. Beeghly, M. & Cicchetti, D. (1994). Child maltreatment, attachment, and the self system: Emergence of an internal state lexicon in toddlers at high social risk. *Development and Psychopathology*. 6: 5-30. Barlow, J. & Schrader McMillan, A. (2010). *Safeguarding Children from Emotional Maltreatment: What Works*, Jessica Kingsley Publishers. Lemche, E. et al. (2004). Mentalizing Language Development in a Longitudinal Attachment Sample: Implications for Alexithymia. *Psychother Psychosom*. 73:366–374.

⁸ Snow, P. C. et al. (2012). Oral language competence, young speakers, and the law, *Language, Speech and Hearing Services in Schools*. Oct;43(4):496- 506.

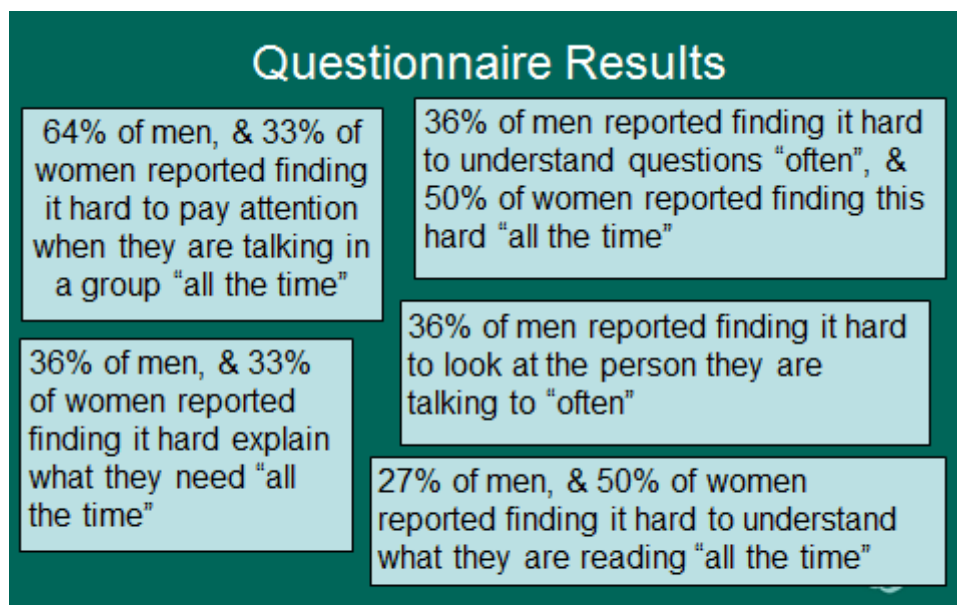
⁹ Van de Kolk, B. (2015). *The body keeps the score*. Penguin.

¹⁰ Yehuda, N. (2016). *Communicating trauma. Clinical presentations and Interventions with Traumatised Children* Routledge.

¹¹ Hollo A, Wehby JH, Oliver RM. Unidentified Language Deficits in Children with Emotional and Behavioral Disorders: A Meta-Analysis. *Exceptional Children* 2014; 80(2): 169-186.

- Difficulty understanding spoken words and using language to communicate.
- Difficulties remembering and recalling information accurately.
- Difficulty understanding commonly used legal vocabulary, for example Liable, Remorse, Reparation, Threatening or Victim. These difficulties have prevented effective access to the legal and court system.
- Difficulties in listening and understanding
- Difficulties sequencing information to tell a story.
- Difficulty using abstract language (for example idioms, metaphors).
- Difficulties staying on topic.
- Understanding non-verbal communication and relating to others in socially acceptable ways.
- Difficulty expressing feelings and emotions in an appropriate way, for example they may use aggressive behaviour, instead of words, to express themselves.

❖ The below data from the 2018 Hydebank Wood College SLCN screening project, illustrate the types and nature of the communication difficulties experienced by men and women:



 South Eastern Health and Social Care Trust

(Source: SLT, Healthcare in Prison Team, SET).

- ❖ The implications for a young person with SLCN within the CJS can be profound. Unidentified SLCN can prevent individuals from accessing rehabilitation programmes, employment and building relationships which can perpetuate the cycle of offending.
- ❖ Young people with SLCN may not understand the terms of their sentence and what is required of them in their court order or under a licence agreement. ***Evidence has showed that one of the main reasons for breach of community licence is failure to meet the terms of that sentence due to a lack of understanding of the terms¹².***

¹² RCSLT Justice Evidence Base: Consolidation 2017

- ❖ Given their unique expertise in speech, language and communication, speech and language therapists also have a key role to play in supporting people are affected by domestic abuse and their children, both at an individual level, for those with communication difficulties, and in relation to parent and child interaction.
- ❖ Speech and language therapists are able to identify people’s communication needs and advise on the appropriate response. This can include training other professionals in how such needs present and how they might be best supported as well as providing direct speech and language therapy to those who require it.

Q3 Do you agree with the information in the Strategic context? Yes/No

- ❖ Yes, although we would welcome some additions as detailed in Q4.
- ❖ The RCSLT particularly welcome the inclusion of the Improving Health within Criminal Justice Strategy which recognised the high prevalence of speech, language and communication needs, (SLCN) among people who offend.
- ❖ SLTs have a vital role to play in identifying communication needs, supporting understanding and participation for individuals within the criminal justice system. However significant gaps remain in identifying and supporting communication difficulties of women and girls and we would welcome some amendments to this section to help highlight this important issue.

Q4 If applicable, please let us know if there is anything you would want us to change or add.

- ❖ The RCSLT would welcome the inclusion of two additional relevant pieces of information that highlight the importance of identifying and supporting communication needs throughout the criminal justice system:
- ❖ The report ‘[Locked up and Locked Out: Communication is the Key](#)’ in partnership with the [Youth Justice Agency \(2009\)](#)¹³ highlighted the need to support communication difficulties of young people who come into contact with youth justice services in NI. This remains important as despite significant evidence indicating a high level of need, there is still no access to SLT services within the youth justice estate in Northern Ireland. This is in contrast to the adult prison service in NI (see case study below) where SLTs are now as part of the NI Prison Health Team.
- ❖ [The Registered Intermediary schemes and Pilot Post Project Review](#). As the Department is aware these schemes provide communication support to vulnerable victims, witnesses, accused and defendants. It provides excellent evidence of the need to, and benefit of, providing specialised communication support to achieve best evidence for the justice system. We note that during the pilot phase 112 females were referred and accessed the scheme¹⁴. SLTs are among the professionals who are employed as RIs.

¹³ YJA / RCSLT NI Report (2009), ‘Locked Up and Locked Out: Communication is the Key’ available at <https://www.justice-ni.gov.uk/publications/locked-and-locked-out-communication-key>

¹⁴ [Northern Ireland Registered Intermediaries Schemes Pilot Project - Project Review \(justice-ni.gov.uk\)](#), Appendix A.

Q5 Do you agree with the title we have proposed?

Agree

Disagree

Q6 If applicable, how would you change the title?

- ❖ Members work to support women and girls in contact with the justice system have queried the use of the word 'challenge' within the title. Their experience, as emphasised in the document, is that often women and girls are drawn into the criminal justice system due to a myriad of complex factors and vulnerabilities and are often victims of crimes themselves.
- ❖ An alternative title may be to omit 'challenge' entirely, or to amend the word 'challenge' to 'enable' or 'encourage'? We feel this would be more in keeping with the spirit and focus of the strategy content and align with the context that women and girls require support to enable them to take personal responsibility and actions to successfully break the cycle of offending.

Q7 The Strategy should be for:

Five years

Six years

Seven years

Five years with two action plans for years six and seven (that will lead into a new delivery framework)

Other

If 'Other', please provide an alternative.

- ❖ Given the breadth of the vision contained in the strategy a longer period would be welcome. We are also conscious in answering this question of the plans to create a new care and justice campus and accompanying framework for integrated therapeutic care, and potentially new legislation. Ensuring that this new campus includes SLT provision and provides training to other agency staff to undertake screening and deploy communication supports will be crucial to early intervention for girls and young women envisaged here.
- ❖ The RCSLT note the intention of the mental health strategy to span a ten-year period with yearly delivery plans. Given the acknowledgement of the impact of trauma and mental health needs on women and girls in the justice system, many of the actions outlined will depend on close cooperation with the department of health, as well as the full range of statutory and community and voluntary sectors. As such this may require a longer timeline to implement.

Q8 Do you agree with the vision proposed for supporting and challenging women in contact with the criminal justice system?

Agree

Disagree

Q9 If applicable, how would you enhance the vision?

- ❖ As outlined above unidentified communication needs are a profound, but often hidden barrier to participation and rehabilitation. The RCLST would recommend the inclusion within the vision discussion (pg. 25) of a reference to identifying any barriers for individuals, for example: “empowering women by ***identifying barriers*** and giving them the skills and tools needed to follow a pathway from offending”.
- ❖ Interventions to support rehabilitation can include education, mental health and those related to their offending behaviour (for example anger management, weapons awareness, substance misuse). The verbal context of such programmes often disadvantage individuals with communication needs, making information and support difficult to access.
- ❖ Embedding good communication practices and increasing awareness of the communication needs of women and girls in criminal justice offers an opportunity to address this often hidden vulnerability and support rehabilitation. The below case study highlights the work being done already within Hydebank Wood College, where there is an open referral system to SLT and self-referral has taken place.

Case Study: Speech and Language Therapy in NI Prison Health – a growing service

Scoping the need

In 2017/18 a speech and language therapy scoping project assessed the prevalence of SLCN among a sample population at Hydebank Wood College and considered the need for SLT input in the setting. It found that 75% of woman and 100% of men assessed had speech, language and communication difficulties, these included receptive language difficulties (comprehension) and expressive language difficulties (use of language).

The findings of this study led to the creation of the first full-time SLT post in prison health in June 2019, with a mandate to develop a SLT service within prisons here. A second part-time SLT has been appointed (2021) to expand this service to Maghaberry.

SLT as part of the Healthcare in Prison Team

To provide a baseline and inform the development of the SLT service, a questionnaire conducted with all staff within Hydebank Wood – including healthcare, Personal Development Unit (PDU), Northern Ireland Prison Service (NIPS) staff ascertained confidence levels in understanding, identifying and supporting communication difficulties.

SLT identified several ‘quick wins’ by implementing communication supports. For example, developing communication tips sheets, easy read versions of documents including licence agreements and the tuck list, and conducting a social communication group jointly with OT for

men. An interagency speech, language and communication awareness raising session was also devised and offered to all staff. To date, five training sessions have been delivered.

Mental Health and Disability support

An important area for the SLT service is supporting interventions and provision for people with learning disability and/or mental health needs, working closely with Mental Health Nurses, Forensic Psychologists and other health and prison staff. This includes using alternative communication strategies, such as talking mats and visual aids.

The SLT has used these strategies with individuals who have a diagnosis of Personality Disorder and Autism to help them understand their diagnosis and how it impacts them. The SLT has also assisted Mental Health Nurses administer their initial assessment to people with learning difficulties and/or communication difficulties.

Next steps

- interagency training which will be open to all staff at prison sites, will be a rolling programme with the offer of bespoke follow up training for particular staff groups e.g. PDU staff, Belfast Met. It is essential that the SLT builds the capacity of those most proximal to the people who live in each setting.
- A universal communication screen is also being piloted in early 2021 in Hydebank Wood College with all new committals being screened for communication difficulties within 6 weeks of their arrival.

Q10 Do you agree with these overarching priorities?

Agree

Disagree

Q11 If applicable, suggested additions or changes

- ❖ We welcome the priority of early intervention and note the commitment of 'getting access to the rights services at the right time'. The case study below (Pg. 10) demonstrates that there are more opportunities to embed early intervention in relation to identifying hidden communication needs and disabilities, by ensuring that we are embedding more training and awareness of, and access to SLT services, across services.

Q12 Do you agree with the principles?

Agree

Disagree

Q13 If applicable, suggested additions or changes

- ❖ RCSLT NI welcome the acknowledgement “that we need to focus on the individual, as evidence shows one size does not ‘fit all’. Therefore, any response to women in contact with the justice system must reflect and respond to their needs as a woman, and an individual”.
- ❖ Identifying communication needs is fundamental to this approach and as such the principles should make a specific reference to communication. For example, there is a need for more psycho therapeutic interventions that are accessible to those with communication difficulties – the provision of the interventions in of themselves may not be enough if the individual is unable to access these.
- ❖ When considering holistic approaches (pg. 27), The RCSLT would request the addition of communication as follows; “This can only be done through a holistic approach that focuses on, but is not limited to health, wellbeing, welfare, **communication** and behaviour”.

Q14 Do you agree with the proposed strategic themes?

Agree

Disagree

Q15 If applicable, suggested additions or changes

N/A

Theme 1 - Prevention and Diversion

Q16 Do you broadly agree with the introduction and basis to this theme?

Yes

No

Q17 If applicable, proposed additions or changes?

- ❖ The RCSLT NI broadly agree but caution that there is a need to consider if prevention and diversion programmes are accessible to those who communication difficulties which may be hard to spot or are masked by behaviour. Identifying SLCN at the earliest opportunity can reduce the barriers young people face to accessing supports they are offered and need to recover and thrive, however SLCN can be difficult to spot.
- ❖ More funded training about and awareness of SLCN for satellite, community and voluntary services could help reach some young people currently falling through the gaps. Equipping those who are closest to, caring for and supporting at risk young people to identify potential communication barriers should also be considered as part of the prevention element of this work.

Q18 Is there any further practice you think should be highlighted here?

Yes

No

Q19 If yes, please provide some detail.

- ❖ Support for SLCN can help to break the cycle of risky behaviour and/or offending through improving access to education, employment and rehabilitation programmes for a significant number of young people and from the earliest stages of contact with the youth justice system.
- ❖ We welcome the broad cross-departmental and multidisciplinary / multi-agency range of programmes included here and would welcome reference to the below service in this section which is the first of its kind in Northern Ireland. Given the high prevalence and profound impact of communication difficulties among women and girls in contact with the justice system already discussed here, this new 'no wrong door' model of identifying and supporting communication difficulties fits well with the key priorities outlined under prevention and diversion.

A Hidden Need

SLCN and Children in care: A Pilot Project in Residential Care in Western Health and Social Care Trust (WHSCT)¹⁵

This innovative pilot project is currently employing a speech and language therapist on temporary post (concluding March 2022) as part of the residential team working across six children's homes with 36 young people, roughly a third of which are girls. These young people are often moving between residential care, juvenile justice centre and secure settings and have heavy involvement with the police, courts and youth justice system.

The level of need among girls in residential care:

Screening for SLCN is ongoing however results to date have revealed:

- 66% of young women and girls placed in residential care from June 2018 to present have significant and unidentified communication difficulties.
- Of those screened, none were open to core services and only a small number had previous referral to speech and language therapy and then discharged for non-attendance.
- 2 onward referrals were needed for other assessments including ASD, with one confirmed and one waiting:

How the SLT helps:

In addition to scoping the level of need within residential care, education and training in these settings is vital:

- The SLT is putting communication strategies in place to support the work of the wider team, for example each home now has an identified 'communication champion' and the team are working with the SLT to adapt processes and encourage the young person's involvement in a communication friendly way.
- The SLT has introduced the use of talking mats – picture communication symbols – in every home to support the completion of a young person's 'My Views' report which feeds into

their looked after children review to help young people better express their feelings and needs.

- A member of staff in each home has received talking mat training.

Feedback from young women and girls

A Young Person who was admitted to Lakewood (secure unit) told staff there, “you need to phone my communication worker and get my communication profile. That’s what helps me, when you use that”. *Young women*

“Thank you, you are really amazing at your job. You actually understand me”. *Young women.*

Feedback from residential staff, other agencies

“it’s picking up in difficulties we don’t see”, Children’s Home, residential staff.

“I must say it has been beneficial to PSNI.... It has allowed police to keep our systems updated in terms of specific needs of the YP and has given us a heads up in how to best communicate with them”, PSNI.

“My experience with SLT has been fantastic.... When X was admitted to Lakewood, (communication worker) provided me with a detailed SLT report along with a PowerPoint which adapted interventions that worked well with X.... work and approach is fantastic”.
Lakewood, key worker.

- ❖ As the above case study demonstrates many of the young people identified with SLCN are not known or open to core health services, which highlights the need for a new model of working. The evaluation feedback also highlighted that specialised communication support, through a commissioned SLT, has been embraced as enhancing the work of other professionals across multiple agencies and sectors including the PSNI, JJC and community and voluntary services.

Q22 Do you agree with what is proposed in ‘to deliver this we will’?

Yes

No

Q23 If no, suggested additions or changes

- ❖ We are concerned that these commitments overlook the fact that some women and girls will have unidentified disabilities or difficulties that prevent them from expressing their needs, concerns, choices. This in turn may limit their ability to forge ‘strong effective relationships between women and practitioners’, which the strategy acknowledges as hugely important.
- ❖ Communication is everyone’s business, and where difficulties are present as a result of complex trauma, ACEs or missed diagnosis, it is vital that everyone in contact with young women and girls are alert to this and can access / refer for support to make necessary adaptations to ensure accessibility of diversion and prevention supports.

- ❖ Most of the individuals presenting with communication difficulties will not require intensive SLT support:
 - Only 8% of the 67% of new female committals to Hydebank Wood (Dec – March 2021) who were identified as having communication difficulties required direct and ongoing SLT intervention and assessment. The remaining 59% could be supported using communication profiles which identify the types of difficulties involved and suggest advice, strategies and environment adaptations that other staff can use, alongside an SLT review.
- ❖ Supporting communication is everyone’s business and as such the SLT role includes empowering the person / people who are most proximal to the individual to support communication difficulties and ensure that they do not present an invisible barrier to understanding, engagement and participation.
- ❖ As such, we would request that the first commitment is amended to reflect our concerns to ‘listen to women and girls in contact with the justice system **and provide support to ensure their voices are heard**’.

Q24 Do you broadly agree with the introduction and basis to this theme?

- Yes
- No

Q25 If applicable, proposed additions or changes?

- ❖ We note the reference to challenging behaviours in the introduction to this section. The below case study illustrates the often complex presentation of communication difficulties in a younger female and the need for access to SLT. It also demonstrates the strategic collaboration of services and the need for a model where a ‘see behaviour, think communication’ approach is adopted.

Child A’s story¹⁶

Child A is 15. Prior to her present placement, she had had 20 previous placement breakdowns. With a history of aggressive behaviour, including being verbally and physically abusive, she started her placement on a 3:1 staffing ratio due to the risk of assaulting staff. She had a large number of police charges pending. She had previously been identified as having no obvious difficulties with her ability to communicate, but that she would communicate emotion by behaviour.

Following staff concern about her communication skills and inability to understand information, an SLT undertook a full assessment of Child A. This revealed that she had a range of unidentified speech, language and communication needs. The SLT advised both Child A and those working with her how best to support her communication needs, including when attending court.

As a result of this speech and language therapy input, Child A’s communication, social skills and behaviour have improved and the charges against her have been dropped. Staffing levels

¹⁶ RCSLT Factsheet, ‘Supporting Looked After Children’ available at <https://www.rcslt.org/wp-content/uploads/media/Project/RCSLT/rcslt-looked-after-children-factsheet.pdf?la=en&hash=FFDF968AF93D0F933D0B030A7F8DE902BCF9561A>

have been reduced to 2:1 and 1:1 support is being trialled at school. Her social worker commented, 'What I have experienced is Child A's much improved confidence in expressing herself, listening and understanding. This has been an invaluable part of the progress she has made in placement and has allowed her greater opportunities to make meaningful relationships with adults and peers alike.'

- ❖ Related to this we welcome that the recently published Department of Education Emotional Health and Well Being Framework¹⁷ and the emphasis it places on "recognising that all behaviour is communication – not just "acting out" or being aggressive but also silent and withdrawn behaviours".
- ❖ In this section the RCSLT welcome some reference to the fact that challenging behaviours can be a reflection of a hidden need or disability which may require onward referrals or assessment.

Q26 Is there any further practice you think should be highlighted here?

Yes
No

Q27 If yes, please provide some detail.

Q28 Do you agree with the aim?

Yes
No

Q29 Do you agree with the priorities?

Yes
No

Q30 Do you agree with what is proposed in 'to deliver this we will'?

Yes
No

Q31 If no, suggested additions or changes

- ❖ Do the Department consider whether the alternatives discussed in this section are accessible to women and girls with communication difficulties or disabilities?

Q32 Do you broadly agree with the introduction and basis to this theme?

Yes
No

¹⁷ Department of Education (2021), Emotional Health and Well-being Framework, available at <https://www.education-ni.gov.uk/sites/default/files/publications/education/Children%20%26%20Young%20People%20s%20Emotional%20Health%20and%20Wellbeing%20in%20Education%20Framework%20%28final%20version%29.PDF>

Q33 If applicable, proposed additions or changes?

- ❖ As outlined above communication difficulty and disability have a great impact upon every process within the legal and judicial system and affect a person’s ability to fully participate at every stage of the CJS. **We would welcome some reference here to the high incidence of communication needs among women and girls in custody as this strategy offers a valuable opportunity to ensure that these needs are increasingly recognised and supported.**
- ❖ We welcome the acknowledgment of the impact of custodial sentences upon mothers and their children – often impoverished communication skills are part of an intergenerational cycle associated with poverty and involvement in criminal justice¹⁸. Recognising women as mothers and linking this to the strengthening families work, for example through the use of parent/child interaction therapy, is another important aspect to supporting communication needs as part of rehabilitation in custody and reintegration.

Q34 Is there any further practice you think should be highlighted here?

- Yes
- No

Q35 If yes, please provide some detail.

- ❖ The RCSLT would welcome reference here to the Prison Health Team and its expansion in recent years to include additional Allied Health professionals, including SLTs, working as part of the multidisciplinary team and the impact this has had – see case study above.

Q36 Do you agree with the aim?

- Yes
- No

Q37 Do you agree with the priorities?

- Yes
- No

Q38 Do you agree with what is proposed in ‘to deliver this we will’?

- Yes
- No

Q39 If no, suggested additions or changes

Some additional points:

- ❖ The RCLST would welcome some further detail of consideration of issues such as:

¹⁸ The Intergenerational Cycle of Speech, Language and Communication Outcomes and Risks’ [rcslt-communication-capacity-factsheet.pdf](#)

- The need for a new custody setting specific for women to consider the sensory needs of those with sensory issues - this also needs to be person centred and not generic.
- Consideration of how services / transitions will be equipped to support young girls moving from e.g. JJC to adult prison services.
- That there is a need for more psycho therapeutic interventions that are accessible to those with SLCN.
- The needs of the ageing female population in custody including provision around dementia, alcohol related brain injury-Korsakoff’s syndrome and swallowing needs.

Q40 Do you agree with the proposed delivery framework?

Yes

No

Q41 If applicable, proposed changes or additions

- ❖ The RCLST support the position outlined in the document by the Children’s Law Centre around the need for close cross-departmental cooperation on implementation and delivery. To that end, we would welcome further detail on how the appropriate health services will be engaged through the governance structures outlined in the strategy.

Q42 Do you agree with our assessment in terms of Equality?

Yes

No

- ❖ The RCLST would highlight the reference in the discussion of equality the “we do consider that action may be required to ensure appropriate access and delivery” and emphasise that this should include communication accessibility as outlined above.

Q43 Do you agree with our assessment in terms of Human Rights?

Yes

No

Q44 Do you agree with our assessment in terms of Rural Needs?

Yes

No

Q45 Is there any addition information and evidence you think we should consider (please provide brief summary and source if available)

For Further information please contact Vivienne Fitzroy, Policy Adviser, RCLST NI

Vivienne.fitzroy@rcslt.org