Briefing



Painting half the picture: The draft code of practice on diversionary and community cautions

Summary

Pre-court disposals allow the police to deal quickly and proportionately with lower level offending. When delivered effectively, they are an evidence-based way of intervening early to avoid repeat offences. In 2022, around 15% of all criminal justice outcomes for over 18s were a pre-court disposal.

The Government has legislated to simplify the cluttered landscape of pre-court disposals, by abolishing the six existing statutory out of court disposals and replacing them with just two. They have not proposed changes to the range of non-statutory disposals (collectively known as community diversion) used by forces. They have issued a draft code of practice on how this new system will operate.

The Centre for Justice Innovation has worked with 26 police forces over the past nine years to improve the use of evidence-led pre-court disposals, with a particular focus on improving how police forces respond to offences like drug possession and also how they work with particular groups, such as young adults, individuals from minortitised communities with lower levels of trust in the police, and women who have experienced trauma and victimisation.

Based on our knowledge of the evidence base, and our experience and expertise in the field, we welcome the code of practice but feel that by limiting itself to only providing guidance to police forces on the two new statutory out of court disposals, it paints half the picture that forces need to implement the new framework effectively. Specifically, we recommend:

- The scope of the code of practice should be widened to include both the new out of court disposal framework and community diversion, and jointly agreed between and issued by the Ministry of Justice, the Home Office and the National Police Chiefs Council (NPCC);
- The code of practice should be revised to provide better guidance on effective evidence-based practice, especially how to work with and tailor interventions for different cohorts of individuals, such as young adults and women who have experienced trauma and victimisation;
- That it should be clear how implementation of this new framework will be assessed by His
 Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), as part of their
 PEEL (Police effectiveness, Efficiency and Legitimacy) assessment of police forces;
- As part of wider efforts to build trust in policing more generally, the wider code of practice
 promotes the use of community diversion options for individuals from minoritised communities, in
 line with the Lammy review and Commission on Racial Equality recommendations;
- The code of practice could be strengthened to ensure the effective implementation of
 commitments to victims of crime under the Victims Code of Practice, specifically: to improve how
 well victims are informed about what is going on in their case, how well police record data on
 victims, and to make victims more aware of the options they have available, including voluntary
 participation in restorative justice.

1

Background

What are pre-court disposals?

Pre-court disposals have been a feature of our criminal justice system for decades.¹ Although they differ in important ways, in general, a pre-court disposal involves an individual, accused of a crime, agreeing to participate in an activity instead of going to court to be prosecuted. Pre-court disposals allow the police to deal quickly and proportionately with lower level offending. When delivered effectively, they are an evidence-based way of intervening early to avoid repeat offending, especially for children and young people, those from minoritised communities, and for individuals with complex needs, including women who have experienced trauma and victimisation. In 2022, around 15% of all criminal justice outcomes for over 18s were a pre-court disposal.²

Simplifying a cluttered landscape

The pre-court disposal landscape had become cluttered over the years, with new disposals added over time in a piecemeal fashion. Currently, there are six 'statutory' out of court disposals available for police forces to use with individuals over 18. They are known as statutory because they are set out in legislation. In addition, most police forces use a range of non-statutory disposals (collectively known as community diversion), including two of the most commonly used disposals, the Community Resolution and 'Outcome 22s' (a positive activity recorded as a No Further Action but coded on police systems as an Outcome 22). All of these disposals are collectively known as pre-court disposals.

In response to calls from many, including the National Police Chiefs Council (NPCC), to simplify pre-court disposals, the Government through the Police, Crime, Sentencing and Courts Act 2022 ("the Act") is introducing a new two tier framework for statutory out of court disposals for people over 18. This new 'two-tier' framework will abolish the existing six statutory out of court disposals and replace them with just two new disposals, the Diversionary and Community Caution. This move had already been anticipated by a number of police forces who had already moved to a two-tier system, only using Cautions and Conditional Cautions.

A draft code of practice

In August 2023, the Ministry of Justice launched a public consultation on the draft code of practice, intended to support forces with the operation of the two statutory tier framework. This briefing consists of the Centre for Justice Innovation's consultation response, which outlines how the code of practice can be strengthened, and rooted in the evidence on how this important area of police work can effectively resolve lower level offending within the community.

¹ These are now referred to as out of court resolutions by the National Police Chiefs' Council, but for the purposes of this document we are using out of court disposals, which is the term used in the legislation that introduced the new framework.

² Ministry of Justice, (2022). Criminal Justice Statistics quarterly: December 2022. https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2022/criminal-justice-statistics-quarterly-december-2022-html#out-of-court-disposals

General observations

Scope of the code of practice

- The scope of the draft code of practice is limited to statutory out of court disposals. While we recognise that community diversion has not been subject to any legislative change, and note that community diversion is not the responsibility of the Ministry of Justice, we strongly suggest that for this code of practice to be truly useful to police forces the scope should be widened to include both the new out of court disposal framework and community diversion.
- 2. Our work with police forces across the country strongly suggests that police forces want to implement a comprehensive, evidence-led set of pre-court disposals, especially given the wide use of Community Resolutions and the use of No Further Action disposals resulting in an Outcome 22, which has been subject to new guidance by the National Police Chiefs' Council (NPCC). Limiting the code of practice solely to statutory out of court disposals paints only half the picture. Moreover, widening the code to cover all precourt disposals would have provided a more powerful way of highlighting the use of community diversion as a tool to address racial disparity, as recommended in the Lammy review and the recommendations of the Commission on Racial Equality (see specific observations below).
- 3. We therefore recommend that the code of practice should:
 - Be jointly agreed between and issued by the Ministry of Justice, the Home Office and the NPCC, and;
 - Provide guidance on how the new statutory out of court disposal framework is to be used alongside community diversion options.

Detail of the code of practice

- 4. The code of practice provides forces with a general overview of how they are expected to use the two new out of court disposals Diversionary Cautions and Community Cautions. It provides important guidance on issues like decision making and eligibility.
- 5. However, it lacks considerable detail. In particular, it is silent on effective evidence-based practice on which types of conditions may work for different cohorts of individuals, despite there being a growing body of effective practice on these issues. This is in contrast, for example, to the recent Youth Justice Board (YJB), Association of YOT Managers (AYM) and His Majesty's Inspectorate of Probation (HMIP) guidance on prevention and diversion in youth justice.⁶
- 6. For example, we know that police forces will be likely to use the new statutory out of court disposals with women involved in offending who are likely to have experienced significant trauma and victimisation themselves. However, the code of practice provides

³ National Police Chiefs' Council (2022). Outcome 22 (022) Guidance 2022.

⁴ David Lammy, (2017). The Lammy Review. https://assets.publishing.service.gov.uk/ media/5a82009040f0b62305b91f49/lammy-review-final-report.pdf

⁵ Commission on Race and Ethnic Disparities, (2021). Commission on Race and Ethnic Disparities: The Report. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/ file/974507/20210331_-_CRED_Report_-_FINAL_-_Web_Accessible.pdf

⁶ YJB/AYM/HMIP. (2023). Prevention and Diversion Project – final report. Available at: https://yjresourcehub.uk/images/YJB/Prevention_and_Diversion_Project_Final_Report_YJB_Feb_2023.pdf

forces no guidance and no evidence-based practice principles or examples of practice which are likely to be effective for women with complex needs (reference to our evidence and practice briefing *Pre-court diversion for women* may assist). We also know that police forces are likely to use pre-court disposal with young adults — adults aged 18-25 represent over 30% of all police cases; yet the code of practice does not reference the need for setting appropriate interventions which recognises this group's variable maturity, and which address their particular needs, such as accessing education, training and employment and developing skills.

- 7. We recommend that either the code of practice is revised to include effective practice, or additional guidance is provided to ensure best practice is widely adopted. Our briefing, *Establishing pre-court diversion interventions: a guide for police forces*, could be referenced to assist forces in considering their implementation. Where the guidance cannot offer specific advice, it should contain links to helpful resources, such as:
 - Best practice in pre-court disposals for possession of drugs;
 - London Women's Diversion Service:
 - Devon and Cornwall Police Pathfinder scheme;
 - Thames Valley Police Drug Diversion Scheme: Descriptive Manual;
 - The Durham Drug Diversion Scheme Checkpoint: Descriptive Manual;
 - The West Midlands Police Drug Diversion Scheme: Descriptive Manual.

Assessment of implementation of the code of practice

- 8. For the guidance to be truly impactful, it should be clear on what and how implementation of this new framework will be assessed by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), as part of their PEEL (Police Effectiveness, Efficiency and Legitimacy) assessment of police forces.
- 9. We propose creating a new section of the PEEL assessment framework under section 5: 'How good is the force at investigating crime?', which currently reviews out of court disposals. The new section would be titled 'The force makes effective use of out of court disposals and diversion', and would be followed by these new subheadings:
 - 5.5.1 'The scheme commissions a comprehensive range of evidence based interventions, within the options available to them, which are tailored to distinct cohort needs':
 - 5.5.2 'The scheme has robust eligibility criteria';
 - 5.5.3 'The scheme is aware of and takes steps to redress racial disparity;
 - 5.5.4 'The scheme actively involves victims';
 - 5.5.5 'The scheme makes use of a scrutiny panel';
 - 5.5.6 'The scheme enforces good data practices'.

⁷ Whitehead & Waters. (2020). Pre-court diversion for women. Centre for Justice Innovation. Available at: https://justiceinnovation.org/sites/default/files/media/documents/2020-02/pre-court_diversion_for_women_for_website.pdf

⁸ Ministry of Justice, (2019). Criminal Justice System Statistics publication: Outcomes by Offence 2008 to 2018: Pivot Table Analytical Tool for England and Wales.

10. In lieu of any new PEEL section specific to out of court disposals, we suggest that a thematic inspection of the new framework is conducted once it has been live for 12 months. This would enable HMICFRS to assess how the new framework is being implemented and ensure that best practice and any challenges are highlighted.

Strengthening the code to support victims

- 11. The code of practice does include a number of references to asking for victim views on the conditions to be set. It also envisages that there may be specific conditions, such as providing reparation (6.5.c) or an apology (6.5.d) to a victim, which are victim focused. We also note section 6.11 on restorative justice conditions.
- 12. We support these helpful sections. However, we do believe that the code could be strengthened in a number of important ways, as regards to victims. Firstly, we suggest that additional detail should be provided about how the Ministry expects police forces to keep victims informed about what has happened in their case, especially the outcomes of their decision making and, over time, an individual's compliance with the relevant conditions. We think it would be helpful for the code to explicitly include reference to Article 6 of the Victims Code of Practice ("6. To be provided with information about the investigation and prosecution: You have the right to be provided with updates on your case and to be told when important decisions are taken. You also have the Right, at certain stages of the justice process, to ask for decisions to be looked at again by the relevant service provider.")
- 13. Second, the code is an opportunity to outline in detail how the Government expects police forces to record high quality data about victims and to record how victims are notified when things change in their case. Research by the Centre for Justice Innovation strongly suggests that police recording of victims data is a significant weak point in the criminal justice process for victims.⁹
- 14. Lastly, we suggest that section 6.11 on restorative justice makes reference to Article 3 of the Victims Code of Practice ("3. To be provided with information when reporting the crime. You have the Right to receive written confirmation when reporting a crime, to be provided with information about the criminal justice process and to be told about programmes or services for victims. This might include services where you can meet with the suspect or offender, which is known as Restorative Justice.")

Specific observations

Part 3: Explanation of cautions

15. Part 3 provides an explanation of how the cautions sit alongside Community Resolutions. It does not provide a similar explanation of how the cautions fit alongside other community diversion options such as No Further Action which results in an Outcome 22. Given the NPCC's guidance on these, this seems like a missed opportunity to provide police forces with one clear piece of guidance to use.

⁹ Webster and Bowen, (2023). Exploring data gaps on the victims of crime. Centre for Justice Innovation. Available at: https://justicelab.org.uk/wp-content/uploads/2023/07/20230606-The-impact-of-data-gaps-on-the-victims-of-crime-vfinal.pdf

Part 4: Eligibility

The five requirements

- 16. We recognise the code of practice implements the legislation passed by Parliament. However, we remain disappointed that the opportunity was not taken to make the lower tier disposal, the Community Caution, one which required only the acceptance of responsibility. We believe that applying this lower standard would have better reflected the recommendations of the Lammy review¹⁰ and the recommendations of the Commission on Racial Equality,¹¹ which recognised that individuals from minoritised communities are less likely to make admissions of guilt which can deepen and extend their criminal justice journeys. We believe that the inclusion of such a standard may have provided a useful tool for police forces to use in their wider efforts to build trust amongst these individuals and the wider public.
- 17. That being the case, we think there is an opportunity to promote, where appropriate, the use of community diversion options which do not require admission of guilt, and think the code of practice should make explicit reference to the recommendations of both the Lammy Review and the Commission in this regard.

Repeat offending

- 18. We would suggest that this section should better reflect and reference the evidence concerning desistance journeys that individuals often go through a process in which their compliance may lapse and they may need repeat offers before embarking on a process of behaviour change. This section should be clearer that desistance is often not a simply binary state of succeed or fail. Phrases such as "not effective in achieving desistance" leaves a good deal of ambiguity about the relevant considerations in making this determination.
- 19. We are also concerned that the code of practice (in Annex A) puts in place stricter criteria, and gives responsible officers less discretion, in deciding to issue repeat Community Resolutions to the same individual with the Community Caution and Diversionary Caution. The Table in Annex A states that responsible officers should not issue a "Community Resolution for same or similar offence within 12 months unless exceptional circumstances." Yet, for the Community Caution and Diversionary Caution, it provides a much more flexible decision making framework: "Previous convictions, cautions, or other OOCDs in relation to earlier offences do not preclude giving a Diversionary or Community Caution to an offender in relation to the current offence. However, the decision maker should take into account whether they consider that sufficient time has elapsed from the giving of a previous caution for the same or a similar offence, such as within a time-period of the preceding 12-24 months."

¹⁰ David Lammy, (2017). The Lammy Review. https://assets.publishing.service.gov.uk/ media/5a82009040f0b62305b91f49/lammy-review-final-report.pdf

¹¹ Commission on Race and Ethnic Disparities, (2021). Commission on Race and Ethnic Disparities: The Report. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/974507/20210331_-_CRED_Report_-_FINAL_-_Web_Accessible.pdf

¹² HMIP, (2020). Desistance – general practice principles. https://www.justiceinspectorates.gov.uk/hmiprobation/research/the-evidence-base-probation/models-and-principles/desistance/#:~:text=Desistance%20research%20 has%20developed%20over,of%20their%20worth%20from%20others

- 20. As previously noted, this is in conflict with desistance theory, which shows that people often need more than one opportunity to embark on behaviour change. It is also unclear why a disposal that is used to respond to less serious offences would have a more restrictive criterion.
- 21. Concerning paragraph 4.4(h), we are unclear what the guidance means when it states that rehabilitative or repetitive conditions "have been used and… have been exhausted." This could imply that when someone has been offered restorative justice or access to support with their substance use, and have refused or not engaged once, this should not be offered again. Given the reality of desistance and recovery from substance use, we think this would be counter-productive and that offering access to support, for example for substance use, should not be seen as something that could ever be "exhausted."
- 22. Moreover, we are unclear what the Ministry means when it says in paragraph 4.4(h) that where those conditions have either been unsuccessful or exhausted, a "punitive financial penalty may be more suitable." It is unclear how a punitive financial penalty would be a more suitable way of achieving the aim of "reducing the escalating of offending", so it is unclear what this phrasing means.
- 23. We recommend that the guidance would be improved by making reference to our *Precourt diversion for adults: an evidence briefing*.

Part 5: Decision making

Excluded offences

24. Paragraph 5.8 outlines a summary list of excluded offences (set out in detail in Annex C). We are concerned that a blanket exclusion of individuals arrested for possession of bladed weapons as envisaged in Annex C is likely to lead to greater racial disproportionality and will up-tariff individuals who currently receive out of court disposals for these offences. We believe that police forces should be able to exercise their discretion in these circumstances. We note that between 2011 and 2021, there were 31,000 possession of weapon offences disposed of via cautions.

Admissions

25. Paragraph 5.27 suggests that any suspect who gives a no-comment interview is not eligible for either caution. We are concerned that a blanket exclusion of individuals who provide no-comment interviews is likely to lead to greater racial disproportionality. We believe that police forces should be able to exercise their discretion in these circumstances.

Drug possession

26. Paragraph 2.3 names personal drug offences as an example of an eligible offence for using the Diversionary and Community Caution. Our observations of best practice across England and Wales, and our understanding of the evidence base, leads us to recommend that the code of practice should advise that all individuals found by the police to be in possession of a controlled drug (as defined by offences falling within s.5(1) of the Misuse of Drugs Act 1971 (the Act) should not be eligible for either a Diversionary or Community Caution. Instead, they should, by default, be eligible for community diversion (either a Community Resolution or No Further Action). This includes all ages, and regardless of

- previous convictions for drug possession. For more detailed information on how to implement this framework, see our briefing *Best practice in pre-court disposals for possession of drugs*.
- 27. In our judgement, the requirement for admissions of guilt and their criminal record consequences, plus the requirement to enforce conditions within the Community Caution and Diversionary Caution, are too onerous for the vast majority of drug possession cases. Community diversion is the outcome most likely to minimise contact with the formal criminal justice system, and most likely to help individuals minimise the impact of criminal records on their future employment and education.
- 28. In forces with established diversion schemes for drug possession, police officers will address the individual's use of drugs by presenting an incentive to be open and get an assessment about what they are using, which turns a previously incriminating encounter with police into a positive health outcome, while reducing demand and costs to the criminal justice system. This approach has also been seen to improve the relationship between the police and people from minoritised communities who experience over-policing, especially for drug possession. The Thames Valley and West Midlands schemes were positively cited within the Government's Commission for Race and Ethnic Disparities report.
- 29. This is a particularly important approach for young adults aged 18-25, whose drug use is the highest compared to other age groups and is increasing. Drug possession is also the most common offence this group is charged with (excluding motoring offences). Community diversion is the outcome most likely to minimise the impact of criminal records on their future employment and education. Ministry of Justice data shows that the majority of drug possession cases are already disposed of through community diversion for cases involving young adults the proportion is 69%. Therefore, our recommendation is not a substantial change from current practice.

Part 6: Conditions

- 30. In paragraph 6.4, the code of practice suggests that decision makers should conduct "a needs assessment... to ensure rehabilitative conditions are relevant to the offender and there is a problem-solving approach to identifying suitable conditions." No further detail is given about what a suitable proportionate needs assessment would consist of, and it also is left unclear why this would only lead to a needs assessment and not also a risk assessment. It is left unclear what needs are relevant (is it, for example, criminogenic needs, and if so, which ones?) and what assessment tools police forces could use to conduct this.
- 31. In paragraph 6.5.a, it is unclear who will be providing the extra resourcing needed if the placements and supervision for unpaid work are to be integrated with existing probation unpaid work. There is currently a backlog of uncompleted unpaid work placements.
- 32. In paragraph 6.5.b, the attendance condition may require the offender to pay for the reasonable cost of the provision of the education, training, or service. Offender pay schemes pass the cost of engaging in an intervention onto the people in the justice system, with extreme implications for the equality of access to justice. It effectively limits participation to only those who can afford it, who are permitted to pay their way out of being processed through the courts. This creates wealth-based inequalities within the criminal justice system by excluding individuals from lower socioeconomic backgrounds who will disproportionality suffer worse outcomes from the consequences of a court hearing and a criminal record, compared to those with the ability to pay. We strongly believe such a requirement will not assist police forces in reducing reoffending. There is also very little evidence available to show whether paid for interventions are effective at meeting the condition's reparative or rehabilitative aims. The

- code of practice should recommend forces to conduct due diligence before 'commissioning' unevaluated programmes.
- 33. Unlike the two proceeding sub clauses on unpaid work and attendance conditions, paragraph 6.5.c on reparative conditions and paragraph 6.5.e on restrictive conditions does not set any clear time limits or guidelines around what a proportionate condition is. We suggest a maximum period of activity is placed on both of these.
- 34. Paragraph 6.11 states that there is a strong evidence base for the effectiveness of restorative justice in achieving victim satisfaction. This statement should be referenced and the evidence cited should be made specific to its use in pre-court disposals rather than its use in settings where there is a longer time frame to implement restorative justice.
- 35. In paragraph 6.23 the code of practice states: "When determining the conditions to be attached to a caution, the decision maker should consider the totality of the conditions and seek to achieve proportionality to the offending behaviour." However, no further guidance is provided.
- 36. We suggest this section would be improved by a discussion of the evidence around the effectiveness of conditions, drawing from our briefing *Conditional cautions: An evidence review,* as well as a broader discussion of the wider evidence base on efficacy, including on labelling theory, net widening and overdosing.

Part 7: Financial penalties

- 37. Given what we know about court fine repayment, (Government data show that only 49% of people pay their fine within 12 months), we are concerned that repayment of a financial penalty within 28 days may not build in enough flexibility to allow people to pay. Our research on court fines suggest that people are often unclear on what they have to pay, when and to whom, therefore setting a strict time limit of 28 days may lead to more people breaching this condition and receiving the automatic uplift the code of practice envisages. For people on benefits especially, but also those on low incomes, there should be options for instalments like there are for court fines. We believe that a 50% uplift is a large increase for unpaid fines and may have the adverse effect of making repayment less likely.
- 38. We are also concerned about the automatic nature of the payments and whether, in practice, this will be clear and explained to individuals in a way they will understand.
- 39. The code of practice needs to be clearer on what the process and consequence of non-payment will be, especially when it is handed over to HMCTS.

Part 8: Foreign National Offenders

- 40. The code of practice in Section 8 does not include a definition of who 'Foreign National Offenders' (FNOs) refers to. We recommend adding the following definition to the index of terms (bold added for emphasis):
 - "Foreign offender conditions" mean conditions, the objects of which are set out in section 22(3E) of the 2003 Criminal Justice Act, namely: (1) to bring about the departure of the relevant foreign offender from the United Kingdom; and (2) to ensure that the relevant foreign offender does not return to the United Kingdom for a period of time; (3) "relevant foreign offender" has the meaning given in section 22(3G) of the 2003 Criminal Justice Act. In practice, it means an offender with no leave to enter or remain in the United Kingdom and in respect of whom there is a power to enforce their departure from the United Kingdom.

- 41. We understand that these conditions are not new police powers, though we believe that their prominence in the new code of practice may make this a priority for policing, especially when no other group receives the same attention. Out of court disposals are a positive tool the police can use to improve trust with the community that they serve. Setting the removal of FNOs high on individual officer's agendas for the resolution of lower level offences risks undermining the relationship with newly migrant and ethnic minority communities who already experience overpolicing and a lack of trust in police.¹³
- 42. We are also concerned that the new code of practice does not protect against the misuse of FNO conditions, particularly given the complexity of immigration and asylum law, which legislation has recently changed, and the lack of provision for training, oversight mechanisms to monitor decisions, data collection practices, safeguards and an appeal process.

Part 9: Administration and process

43. The section in paragraphs 9.23-9.28 provides very little detail about how police forces are expected to monitor compliance and non-compliance. It is unclear, for example, whether missing one day of unpaid work will be seen as non-compliance and therefore subject to 'further action.' We are aware that this currently varies considerably between forces, and even within forces, and how some services contracted to provide interventions are asked to provide monitoring information for compliance.

How the Centre can help

To keep our communities safer while minimising the collateral consequences of prosecution on people's future life chances, the Centre actively works with the police and other practitioners across the country, to support them to develop evidence-led pre-court disposals for adults. If you are interested in implementing evidence based practice and would like our support, please email our Senior Innovative Practice Officer Bami at bjolaoso@justiceinnovation.org.

To keep up to date with our latest work and recent developments in adult pre-court disposals please click here to subscribe to our quarterly bulletin.

¹³ Commission on Race and Ethnic Disparities, (2021). Crime and policing. https://www.gov.uk/government/publications/the-report-of-the-commission-on-race-and-ethnic-disparities/crime-and-policing#:~:text=The%20 data%20consistently%20highlights%20the,figures%20continue%20to%20remain%20low; Home Affairs Committee, (2021). The Macpherson Report: Twenty-two years on. https://publications.parliament.uk/pa/cm5802/cmselect/cmhaff/139/13902.htm

About the Centre for Justice Innovation

The Centre for Justice Innovation seek to build a justice system which all of its citizens believe is fair and effective. We champion practice innovation and evidence-led policy reform in the UK's justice systems. We are a registered UK charity.

Written by: Lucy Slade

With thanks to Claire Ely and Vicki Morris.

This work is generously funded by the Barrow Cadbury Trust.

Centre for Justice Innovation

Unit 102, Edinburgh House 170 Kennington Lane, London SE11 5DP Telephone +44 (0) 203 735 9436

Registered charity in England and Wales No 1151939 Company limited by guarantee no. 8274430



