

# include YOUTH

## **Response to the Northern Ireland Prison Service consultation on an Employability Strategy**

“Well, you can’t just throw them to the wall like, everyone makes mistakes. Give them a chance and maybe when they get their first pay packet they’ll say, ‘F\*\*\* me, this is great!’ and they’ll stick with it, they’ll want to do it, like my Granny used to say ‘the honest way’. That’s what she always used to say to me ‘do it the honest way son’, but I didn’t, I made mistakes – but I will now, when I get out, if I get the chance” (young person in Hydebank Young Offenders Centre, 2010)

**Date: 12 October 2012**

For further information contact Sara Boyce,  
Research and Information Co-ordinator,  
Include Youth, Alpha House, 3 Rosemary Street, BELFAST, BT1 1QA

028 9031 1007  
[www.includeyouth.org](http://www.includeyouth.org)

[sara@includeyouth.org](mailto:sara@includeyouth.org)  
[twitter.com/includeyouth](https://twitter.com/includeyouth)

## **Include Youth**

Include Youth is an independent non-governmental organisation that actively promotes the rights, best interests of and best practice with disadvantaged and vulnerable children and young people.

The young people we work with and for include those from socially disadvantaged areas, those who have had poor educational experiences, those from a care background, young people who have committed or are at risk of committing crime, misusing drugs or alcohol, undertaking unsafe sexual behaviour or other harmful activities, or of being harmed themselves.

The Give and Take Scheme aims to improve the employability and increase the self-esteem of young people in need or at risk from across Northern Ireland. The Scheme works with approximately 135 young people from a care or criminal justice background. The Scheme aims to support young people to overcome particular barriers that prevent them from moving into mainstream training or employment and towards independent living. 75% of young people on the Scheme are care experienced while over a third has a background in offending. We have strong partnerships with all Health Trusts, the Youth Justice Agency, the Probation Board Northern Ireland and the Department for Employment and Learning's Careers Service. The Scheme provides essential skills training (Literacy, numeracy and ICT) to all of the young people.

Include Youth's Young Voices project is a way of delivering participative democracy to marginalised young people in Northern Ireland. Its main aim is to support marginalised young people at risk or with experience of the criminal justice system, to become involved in decision making processes which impact on their lives, particularly in social welfare, education and criminal justice matters. The project works with a range of groups of young people in the community, in Woodlands Juvenile Justice Centre and in Hydebank Wood Young Offenders Centre.

Reflecting the profile of the young people we work with, Include Youth's two main policy priority areas are employability and youth justice. We have engaged closely with the recent reviews of both the Youth Justice System in Northern Ireland and the Prisons Review, by the Department of Justice, as well as with the development by the Department for Employment and Learning of the recently published Pathways to Success Strategy. We are currently engaged in follow up work arising from all of these reviews.

## **Approach to this response**

As outlined above our Give and Take scheme works with vulnerable and disadvantaged young people aged 16-21, over a third of whom will have had experience of the justice system.

The Give & Take model is predicated on a number of critical elements including the provision of intensive support to the young person, collaborative partnerships with a range of bodies including statutory agencies, public and private sector employers, colleges and training organisations and the community and voluntary sector. The programme is comprised of four distinct but interrelated elements: personal development, training, works experience and mentoring. All of these elements are designed to achieve the outcome of improved employability for the young person.

In view of our longevity of experience and our track record in achieving positive outcomes, including in education, training and employment, with young people who offend, Include Youth very much welcomes the opportunity to respond to this consultation by the Northern Ireland Prison Service (NIPS).

We very much welcome the development of this Strategy by the NIPS and hope that our comments will be helpful to the further development and implementation of the Strategy. Our response is directly informed by the voices and experiences of young people who have been in youth justice custody, the views and expertise of practitioners who work with them, as well as policy analysis and the application of relevant international human rights standards.

While we certainly have valuable learning and insights to share from our experience of working with under 18s in Hydebank Wood Young Offenders Centre we do not plan to provide any commentary or recommendations as to how this Strategy might be tailored to meet their specific needs, in line with the recommendations of Youth Justice Review, the Prison Review team and the Criminal Justice Inspection Northern Ireland, that all under 18s should be removed from Hydebank Wood and accommodated in Woodlands Juvenile Justice Centre, where their education and training needs can be more appropriately met.

Aside from this clarification however we do believe that this proposed Strategy should cover all prisoners, irrespective of their prison status, including those on remand.

We have not answered each question set out in the consultation document but rather have grouped our comments under a number of themes.

## **Key Concern – the failure to address the specific needs of young prisoners**

**Our biggest concern regarding the proposed Strategy is that there appears to be a complete failure to recognise the specific needs of young prisoners anywhere within it.**

Following the removal of all under 18s from Hydebank Wood Young Offenders Centre the Prison Service will continue to have responsibility for young adults up to the age of 21 within Hydebank Wood, or on occasion up to 24 years of age.

It is universally recognised that young people in general form a distinct group within the prison population, a group which is particularly vulnerable and which has particular needs given that they are still developing and maturing. A number of significant reports, including the Owers report<sup>1</sup> and reports by the CJINI<sup>2</sup> have drawn attention to the need for specific measures to address the education, training or employment needs of young prisoners. The Prison Review Team noted that *“the young adult population of Hydebank Wood is in many ways a forgotten group in the Northern Ireland penal system”*<sup>3</sup> The Prison Review Team was extremely critical of the education and training provision in Hydebank Wood, making the following observations *“there was no coherent strategy, an outdated curriculum, insufficient collaboration with external partners, serious problems of teaching and under achievement and poor allocation systems. Resources and external investment were not only insufficient, but were wasted or under used”*.<sup>4</sup>

These criticisms echoed an earlier negative assessment provided by the CJINI in 2011 which included the following commentary regarding the mismatch between the curriculum and labour market needs: *“the curriculum was outdated and did not match the needs of prisoners, employers or the local labour market”*<sup>5</sup> The CJINI report recommended that a dedicated education and training policy for young people be developed.<sup>6</sup>

---

<sup>1</sup> Prison Review Team (2011) Review of the Northern Ireland Prison Service: Conditions, Management and Oversight of all Prisons

<sup>2</sup> Criminal Justice Inspection Northern Ireland (2012) Learning and Skills Provision by the Northern Ireland Prison Service; NIPS

<sup>3</sup> Op cited at note 1 p 70

<sup>4</sup> Ibid p 72

<sup>5</sup> CJINI (2011) Inspection Report on Hydebank Wood Young Offenders Centre and Women’s Prison paragraph 1.27

<sup>6</sup> Ibid paragraph 3.8

The experiences of young people consulted with by Include Youth reinforced the findings of these reports<sup>7</sup>:

*“I’ve got **no** qualifications, nothing. I **need** something for when I get out, cos the jobs out there are f\*\*\*ed – there’s joiners, plumbers, electricians, all with no work – I need to have **something** to help me get work.”*

*“There’s nothing about how to apply for a job, fill in an application form or do a job interview.”*

*“I was told that it’d be 10 days after I moved (to a new landing) that I’d get to go back to education, but it’s been three weeks and nothing’s happened.”*

NIPS officials did indicate to the Justice Committee that they recognised that “each *prison has its own set of prisoners, ranging from young people to women*”<sup>8</sup> but there is no evidence that this recognition informed the development of the Employability Strategy in any way.

**Include Youth strongly recommends that the NIPS addresses this serious weakness in the draft Strategy by either developing a separate stand alone Employability Strategy for young prisoners or that it includes a dedicated section within the current Strategy that addresses the specific employability needs of young people and that includes specific objectives and actions to meet these needs.**

## **Consultation**

Include Youth welcomes the fact that this consultation runs for a period of 17 weeks, a time frame which is in line with the Equality Commission’s guidance.<sup>9</sup>

The consultation document states that the NIPS is fully committed to fulfilling its Section 75 obligations but fails to indicate whether it has undertaken a screening of the consultation document and what the outcome of any screening undertaken may have been. It also references its legal obligations under the Disability Discrimination Order but again doesn’t indicate what specific steps if any it has taken to ensure compliance.

---

<sup>7</sup> Include Youth consultationS with young people in Hydebank Wood Young Offenders Centre July 2012

<sup>8</sup> Northern Ireland Assembly Committee for Justice Official Report ( Hansard) Employability Strategy : Northern Ireland Prison Service 8 December 2011

<sup>9</sup> Equality Commission Northern Ireland (2010) Section 75 of the Northern Ireland Act 1998 A Guide for Public Authorities p38

NIPS officials, in a briefing to the Justice Committee<sup>10</sup> made reference to Section 75 ‘equality screening’ but it was unclear from this briefing whether any screening had actually been undertaken. They stated that *“it is planned to revisit that screening and the need for regulatory impact screening at the consultation stage”*.<sup>11</sup> Equality Commission guidance regarding screening clearly states that *“screening is one of the key tools to enable public authorities to fulfil their statutory obligations and mainstream the Section 75 equality and good relations duties into policy development and service delivery”* and furthermore that *“screening is more useful if it is introduced at an early stage when developing or reviewing a policy”*<sup>12</sup>

**Include Youth urges the NIPS to ensure that it fully complies with the Department of Justice’s Equality Scheme<sup>13</sup> and the Equality Commission’s Guidance on Section 75 in the development of this Strategy.**

NIPS officials also indicated to the Justice Committee that they planned to undertake consultation with prisoners as well as planning to organise forums and focus groups through the press and media and through attendance at face to face meetings.<sup>14</sup> **Include Youth would request that more information of these various elements of the consultation process and their outcomes.**

## **Strategic Context for the development of the Strategy**

The development of this Strategy takes place within, on the one hand a particularly challenging context, of rising unemployment both internationally and domestically and a changing labour market, coupled with large scale public sector cuts and a radical welfare reform agenda, but also within a context of major policy and legislative developments within the two most relevant government departments for the Strategy i.e. Justice and Employment and Learning, all of which offers potential to develop a comprehensive and integrated Strategy.

It was most surprising to note the lack of any discussion of the strategic context which informs the development of this three year Strategy. The challenges of developing an employability strategy for people who offend, within the current economic context, were

---

<sup>10</sup> Op cited at note 8 p4

<sup>11</sup> Ibid p4-5

<sup>12</sup> Op cited at note 9 p41

<sup>13</sup> Department of Justice ( 2012) Equality Scheme for the Department of Justice 2011-2015 ( approved by the Equality Commission March 2012)

<sup>14</sup> Op cited at note 8 pages 4-5

touched on briefly in the NIPS briefing to the Justice Committee but we would have expected to see a much fuller exploration of these and other related issues within the consultation document.

**Include Youth recommends that the NIPS include its analysis of the current and future strategic context for the development and implementation of this Employability Strategy in the final Strategy document.**

## **Relevant International Human Rights Standards and Framework**

The Owers Review of Prisons set two key organising principles of a good prison system, which it viewed as ‘interlinked pillars’ – those were firstly that it *“must support and reflect human rights standards and ethical values”* and secondly that it *“must be based on a premise that the prisoners within can develop and change, and must provide the opportunities for them to do so”*.<sup>15</sup>

The report notes that human rights standards, far from being seen as ‘negative or legalistic’, *“provide a positive, practical and ethical basis for running prisons”* and that *“together with recent criminological research they (also) emphasise that, in order to protect society, prisons need to provide opportunities for prisoners to change and desist from crime”*.<sup>16</sup>

The relevant human rights standards are contained in a number of EU and UN conventions and guidance documents, including the International Covenant on Civil and Political Rights<sup>17</sup>, UN Basic Principles for the Treatment of Prisoners<sup>18</sup> and the European Prison Rules<sup>19</sup>. While young adults are not specifically covered in any of the international conventions relating to custody they are referred to in the Beijing Rules which state that *“efforts should be made to extend the principles embodied in the Rules to young adult offenders”*,<sup>20</sup> including those set out in Part 5 regarding institutional treatment.

---

<sup>15</sup> Op cited at note 1 p 9

<sup>16</sup> Ibid p10

<sup>17</sup> UN High Commissioner for Human Rights (1976) International Covenant on Civil and Political Rights Article 10.3

<sup>18</sup> UN General Assembly A/Res/45/111 (1990) Basic Principles for the Treatment of Prisoners paragraphs 6 and 8

<sup>19</sup> Council of Europe Rec (2006) 2 of the Committee of Ministers to member states on the European Prison Rules

<sup>20</sup> UN Standard Minimum Rules for the Administration of Juvenile Justice ( “ the Beijing Rules”) , adopted by General Assembly Resolution 40/33 of 29 November 1985

**We believe that the Strategy would benefit greatly from being located within a human rights framework, in line with the Owers report and recommend that this happens.**

### **Strategy's aims and purpose**

Include Youth has considerable experience of delivering employability programmes for vulnerable and disadvantaged young people, many of whom will have had experience of the criminal justice system. A central objective of these programmes is to support and enable people to develop their capacity and capabilities in order to be effective in the workplace. If they develop the necessary attributes, skills and knowledge then they will be much better placed not only to find employment but **to sustain employment**. While some of the necessary skills are functional (ICT, literacy, numeracy) or work related (team working, time management, customer service, reliability) some of the most important skills and attributes are emotional and/or behavioural – these include self esteem and self belief, self confidence, motivation, adaptability and resilience.

Also related to a young person's ability to re-integrate from custody into the community outside again is their sense of identity and belonging – a lack of a sense of belonging in 'normal' society fuels their perception and belief that they won't be *able* to get a job.

All areas of personal and skills development are equally important in ensuring that a person can not only be successful in gaining employment but also in sustaining employment and obtaining new employment if required.

Equally important is the recognition that the process is seen as a dynamic, continual one, which interacts with and is impacted upon by external social and economic factors as well as an individual's personal circumstances.

The aim, purpose and objectives of the strategy as set out in the consultation document appear to be overly focused on the sole result of individuals securing employment on release, rather than on providing individuals with the knowledge, skills and attributes and **on a clear progression route into employment**; one of the young people Include Youth has worked with described the journey involved as follows "*I've got the confidence to go for a job but I'm not confident I'd get it – or if I do it'll take a while*".<sup>21</sup>(Emphasis added) While the consultation document does talk about moving people closer to employment, and makes reference to the need to "*address any wider issues that may affect their ability to*

---

<sup>21</sup> Op cited at note 7

*access employment*<sup>22</sup> tellingly, both the objectives and the measurement of success are quite narrowly focused on the individual gaining employment.

We would agree with the Prison Review Team's recommendation on the importance of addressing personal and social elements of the development process as well as the more functional elements *"it is important to provide activities and opportunities for the kind of personal development that is essential, both to encourage engagement with formal education and skills training and to stimulate the personal change and responsibility that is needed to make the best use of any successes in prison"*<sup>23</sup>

**It is clear that prisoners will need an individualised, comprehensive support plan which identifies and addresses all of the personal and structural barriers that impact on their employability chances. The contribution of prison officers in supporting the implementation of these plans will be crucial and this underscores once again the critical need for training and skills development for prison officers.**

**Include Youth recommends that NIPS revise its aims, purpose and objectives of its Employability Strategy in order to ensure it reflects a greater recognition of the broader personal and social objectives to be achieved through such a Strategy.**

## **Relationships**

Encouragingly the consultation document acknowledges that if the Strategy is to meet its strategic aims and objectives its relationships both with related strategies, policies and procedures, as well as with key stakeholders will be of importance. However, beyond this initial acknowledgment and a listing of a number of strategies such as the NIPS Learning and Skills Strategic Plan 2010-2013 and the DOJ's consultation on a Strategic Framework for Reducing Offending (in draft) there is little evidence that the development of this Strategy on Employability has taken place in the context of, and has taken cognisance of, other key strategies, both within the Department of Justice but also more broadly across government. The central purpose of the Reducing Offending Framework as described by the Minister for Justice David Ford is to *"build an overarching framework within which our key strategies are linked together and which connects to similar approaches being taken forward across government"*<sup>24</sup> Among the strategic drivers identified for the framework are increasing

---

<sup>22</sup> ibid

<sup>23</sup> Op cited at note 1, p 60

<sup>24</sup> Department of Justice ( June 2012) Reducing Offending: Towards a Safer Society consultation document, foreword by Minister for Justice Mr. David Ford p 2

employment and skills and improving educational attainment and the development of pathways to resettlement and rehabilitation. **There is little evidence of how this Employability Strategy, as currently framed, would contribute effectively to such a high level strategic approach to reducing offending.**

The CJINI also underscored the necessity of high level, strategic collaborative work between government departments *“It is the professional view of ETI and CJI that there are areas where collaborative ministerial intervention, requiring departmental officials to work together to produce solutions within a challenging timetable, could prove beneficial”*.<sup>25</sup>

Include Youth would have fully expected to see a cross referencing with the Executive’s recently published Pathways to Success Strategy, its Strategy to address the issue of young people not in education, employment or training. This Strategy is designed to address the needs of young people up to 24 years of age and contains a number of recommendations in relation to the employability of young people who offend, with the Department of Justice leading on all of them.<sup>26</sup> It is difficult to see how this Strategy as currently framed, without any specific focus on the specific needs of young prisoners, can deliver on the Anticipated Outcome in relation to young people who offend as detailed in the Pathways to Success

Strategy which anticipated *“increased education and employability skills and employability of offenders and provision of pathways into employment and training”*.<sup>27</sup>

Similarly we would have expected that this Strategy would be cross referenced with the recommendations arising from the Youth Justice Review. The Review of the Youth Justice System in Northern Ireland recommended that *“greater priority should be accorded to the rehabilitation and re-integration of young offenders in custody. They should be prepared for release from the outset through, for example, day release for the purpose of education, training or employment and should have continuing access to support on a multi agency basis”*.<sup>28</sup> The Youth Justice Review highlighted the lack of resourcing and priority currently being provided for re-integration work with young people in the custody, noting that employability projects, such as Include Youth’s Give and Take Scheme *“suffer from insecure project funding, lack of support from mainstream public services and an almost universal*

---

<sup>25</sup> Op cited at note 2 p15 para 6.1.

<sup>26</sup> NI Executive (2012) Pathways to Success Preventing Exclusion and Promoting Participation of Young People: A Northern Ireland Executive Vision, Strategy and Action Plan

<sup>27</sup> Ibid Action Points 35-38: Reduction in offending via appropriate employability related programmes

<sup>28</sup> Department of Justice (2011) Report on the Review of the Youth Justice System in Northern Ireland, Recommendation 20

*lack of robust evaluation, all of which are symptomatic of the overall lack of priority afforded to reintegration work with this group of young people”.*<sup>29</sup>

It should be noted that while the remit of the Youth Justice Review was around children and young people under 18 years of age the Review Team nonetheless noted that many of those young people will have turned 18 but the time their sentence is finished and will be supervised by adult services. The Review Team observed that “*the same problems apply in respect of young adults and require similar attention*”,<sup>30</sup> an observation that Include Youth agrees with.

The development of this Strategy provides a real opportunity for the NIPS to develop more collaborative work with the Department for Employment and Learning, the lack of which was criticised by the Prison Review Team: “*DEL has not so far been a key partner in the planning and delivery of education and skills training in prisons. Except in Magilligan, where there has been some positive engagement with the North West Regional College, prison education and training operates in a vacuum, delivering courses that may or may not be relevant to prisoners needs or employment possibilities and which are often disrupted or underused because of regime restrictions*”.<sup>31</sup>

Disappointingly the only reference to DEL was in relation to a proposed review of its Progress2Work scheme.

**It is vital that the Department for Employment and Learning is seen as a key partner in the development and delivery of a successful Employability Strategy and Include Youth would therefore recommend that much greater emphasis is given to how better and more co-ordinated work with DEL can be developed. For example, Include Youth is unsure whether a Partnership Agreement between DEL’s Careers Service and NIPS, such as that recently announced by DOJ in relation to the Youth Justice Agency, currently exists?**

This was something that was recommended by the Criminal Justice Inspection Northern Ireland in a recent inspection of learning and skills provision by the NIPS; CJINI noted that “*while there may be a role for several NI Government Departments in supporting NIPS, there would be particular value in the Department of Justice enhancing its collaborative approach to a higher level with the Department for Employment and Learning*”.<sup>32</sup>

---

<sup>29</sup> Ibid p81

<sup>30</sup> Ibid p81

<sup>31</sup> Op cited at note 1, p 59

<sup>32</sup> Op cited at note 2, p 15

The SEE programme announced by the NIPS in June 2011 set out a programme of radical structural change including the redefining and professional development of prison officers' roles. Emphasis was placed on the need to provide prison officers with the necessary training, skills and support to enable them to fulfil their role in placing prisoners at the centre of the focus within the prisons. It also envisaged a transformation in the culture within prisons. It was not clear to Include Youth how this Strategy will be aligned with and complement that programme of change contained in the SEE programme.

A legislative and policy development that we would have expected to see some reference to is the Welfare Reform Bill and the concomitant Employment Programme planned for 2013. Both developments will have implications for prisoners accessing both benefits and employment opportunities.

### **Role of the community and voluntary sector**

One of the core principles of the (draft) Reducing Offending Framework is working in partnership, including with the community and voluntary sector and the draft Framework attaches a high priority throughout the document to the need to work in partnership with the community and voluntary sector.

The Prison Review Team also recognised the valuable role that can be played by the community and voluntary sector as a key partner in helping to deliver on strategic objectives, noting that “ *some of the most successful and innovative projects involve cooperation between the voluntary, statutory and community sectors, stretching into and outside prison*”;<sup>33</sup> it helpfully referenced a number of such projects including NIACRO's Jobtrack project, Extern's training and work experience programme with long serving prisoners in Maghaberry and Include Youth's Give and Take programme.

The CJINI inspection of Learning and Skills provision also commented on the benefits of 'external partnerships', highlighting those with education providers:

*“Inspectors are very positive about the essential skills provision delivered at Magilligan Prison through an external partnership with the NWRC. In addition, collaboration with the Open University is clearly beneficial for many prisoners, particularly the more able and those who have progressed from lower levels of provision.”*<sup>34</sup>

---

<sup>33</sup> Op cited at note 1, p59

<sup>34</sup> Op cited at note 2, paragraph 6.3p15

While acknowledging the benefits that accrue from ‘the full participation of stakeholders’ in meeting the Strategy’s aims and objectives, the consultation document is very short on detail as to the thinking of the NIPS in this regard.

**We would urge the NIPS to ensure that the benefits of real partnership working with the community and voluntary sector are fully recognised and that the Strategy and associated actions reflect this.**

## **Implementation**

The milestones and underpinning activities set out in Annex A would appear to Include Youth to have a somewhat less than ambitious timeframe for a new Strategy, and we would question why important elements such as the introduction of a flexible provision of learning and skills services that will allow those services to be tailored to the job market and to prisoners’ needs (Year 2, Milestone 4) or the introduction of a comprehensive ‘employment pre-release pack’ for all prisoners to aid successful resettlement ( Year 2 Milestone 5) are not programmed into the Strategy’s implementation plan until year 2.

In addition to a rather modest timeframe the implementation plan is short on detail against which it can be assessed. For example, without further information it is difficult to assess how effective the planned action around ensuring the development of employability skills as a core element of sentence plans will be.

**We would therefore ask whether the NIPS intends to develop and publish a more detailed implementation plan beyond what is contained in the consultation document.**

**We would also question whether progress has been made on the Prison Review Team’s recommendation on the need to recruit a new post at Director level focused on rehabilitation, as part of the Strategy’s implementation plan?<sup>35</sup> (Emphasis added)**

---

<sup>35</sup> Op cited at note 1 Recommendation 32 “ *the Northern Ireland Prison Service should create and recruit to a new post at Director level, focused on rehabilitation: bringing in expertise in working with the statutory, voluntary and community agencies and private sector employers, to structure and develop appropriate partnerships. This should focus on effective and professionally delivered education, work and skills training within prisons, linked to employment and educational opportunities and support in the community, as well as other softer skills necessary to support personal development and change*”

## Monitoring and Review

**It was unclear from the consultation document whether the final review of the Strategy would be conducted internally or externally, so we would ask for this to be clarified.**

Include Youth would also ask whether NIPS has any plans to involve external stakeholders, including DEL and DE, employer bodies and the community and voluntary sector in monitoring delivery of the Strategy and if so what mechanisms and processes it would plan to utilise in order to facilitate this? We would also ask whether any thought has been given to building in feedback from prisoners on the effectiveness of the Strategy. **We would recommend the involvement of key stakeholders, and particularly prisoners themselves, in monitoring the delivery of the Strategy.**

## Recommendations

1. Include Youth's biggest concern regarding the proposed Strategy is that there appears to be a complete failure to recognise the specific needs of young prisoners anywhere within it. We strongly recommend that the NIPS addresses this serious weakness in the draft Strategy by either developing a separate stand alone Employability Strategy for young prisoners or that it includes a dedicated section within the current Strategy that addresses the specific employability needs of young people and that includes specific objectives and actions to meet these needs.
2. Include Youth urges the NIPS to ensure that it fully complies with the Department of Justice's Equality Scheme and the Equality Commission's Guidance on Section 75 in the development of this Strategy.
3. Include Youth requests that more information of the various elements of the consultation process and their outcomes be provided.
4. Include Youth recommends that the NIPS include its analysis of the current and future strategic context for the development and implementation of this Employability Strategy in the final Strategy document.
5. We believe that the Strategy would benefit greatly from being located within a human rights framework, in line with the Owers report and recommend that this happens.

6. It is clear that prisoners will need an individualised, comprehensive support plan which identifies and addresses all of the personal and structural barriers that impact on their employability chances. The contribution of prison officers in supporting the implementation of these plans will be crucial and this underscores once again the critical need for training and skills development for prison officers.
7. Include Youth recommends that NIPS revise its aims, purpose and objectives of its Employability Strategy in order to ensure it reflects a greater recognition of the broader personal and social objectives to be achieved through such a Strategy.
8. There is little evidence of how this Employability Strategy, as currently framed, would contribute effectively to the Department of Justice's high level Strategic Framework for Reducing Offending. It is also difficult to see how, without any specific focus on the specific needs of young prisoners, it can deliver on the Anticipated Outcome in relation to young people who offend as detailed in the Pathways to Success Strategy. Furthermore the lack of cross referencing with the Review of the Youth Justice System in Northern Ireland would appear to be a serious oversight. We recommend that further work is done to ensure that this Employability Strategy is fully cross referenced with other relevant strategies and framework and that it helps to deliver on outcomes within them.
9. It is vital that the Department for Employment and Learning is seen as a key partner in the development and delivery of a successful Employability Strategy and Include Youth would therefore recommend that much greater emphasis is given to how better and more co-ordinated work with DEL can be developed.
10. It was not clear to Include Youth how this Strategy will be aligned with and complement that programme of change contained in the SEE programme and we would therefore recommend that this is addressed in the final Strategy.
11. We would urge the NIPS to ensure that the benefits of real partnership working with the community and voluntary sector are fully recognised and that the Strategy and associated actions reflect this.
12. We would ask whether the NIPS intends to develop and publish a more detailed implementation plan beyond what is contained in the consultation document, which appears to Include Youth to be short on details against which it can be assessed.

13. We would also question whether progress has been made on the Prison Review Team's recommendation on the need to recruit a new post at Director level focused on rehabilitation, as part of the Strategy's implementation plan?<sup>36</sup> (emphasis added)
14. It was unclear from the consultation document whether the final review of the Strategy would be conducted internally or externally, so we would ask for this to be clarified.
15. We would recommend the involvement of key stakeholders, including relevant government departments and the community and voluntary sector, but particularly prisoners themselves in monitoring the delivery of the Strategy.

---

<sup>36</sup> Op cited at note 1 Recommendation 32 " *the Northern Ireland Prison Service should create and recruit to a new post at Director level, focused on rehabilitation: bringing in expertise in working with the statutory, voluntary and community agencies and private sector employers, to structure and develop appropriate partnerships. This should focus on effective and professionally delivered education, work and skills training within prisons, linked to employment and educational opportunities and support in the community, as well as other softer skills necessary to support personal development and change*"