

include YOUTH

**Response to the Department of Justice consultation on Reducing Offending:
Towards a Safer Society.**

5th October 2012

“Is all this not what they’ve been trying to do for years now? It’s never going to change.” (15 year old young woman)

For further information contact Paula Rodgers
Policy Co-ordinator, Include Youth, Alpha House, 3 Rosemary Street,
BELFAST, BT1 1QA

028 9031 1007 paula@includeyouth.org
www.includeyouth.org twitter.com/includeyouth

Introduction

Include Youth is an independent NGO that has been in existence since 1979. The organisation works to promote and protect the rights and best interests of disadvantaged and vulnerable young people. We undertake activities aimed at influencing public policy and policy awareness in the areas of youth justice and education, employment and training of young people. Include Youth works directly with young people to support them to be engaged with policy decision making processes through our Young Voices project and to improve their employability through our Employability services. We produce resources and provide training, information and support to practitioners and organisations.

General Comments

Children and young people come into conflict with the law for a range of complex reasons connected to the broader context of their lives. Local and international research consistently demonstrates that children and young people are more likely to be involved in offending behaviour if they have experienced living in poverty, truancy or exclusion from school, limited educational attainment, neglect or abuse within their families, placement in residential care, drug or alcohol misuse, physical and mental ill health. In Northern Ireland there is the added dynamic of the legacy of the conflict which continues to overshadow the lives of many children, their families and communities.

We therefore welcome the Minister's commitment to address the factors that lead people into criminal behaviour and the obstacles to them moving away from it.

We are fully supportive of the emphasis placed on the need for partnership working both across Government departments and with voluntary and community sectors. The role of the Children and Young People's Strategic Partnership (CYPSP) is critical and we would ask that the DoJ would now work with other departments to support the CYPSP to take this work forward through integrated commissioning.

We take on board the comments made in the document to the extensive consultations which DoJ have been involved in over the past 12-18 months. Include Youth submitted lengthy responses to both the Prison Review and the Youth Justice Review¹. Our submissions contain detailed analysis on a number of issues, including how we can best reduce offending. These submissions are attached for your convenience. We do not wish to repeat what we have already said in these

¹ Include Youth (2011) submission to the Youth Justice Review Team's Review of the Youth Justice System in Northern Ireland; Include Youth, Response to the Prison Review Team; Include Youth (2011) Response to the Report on the Review of the Youth Justice System in NI.

submissions, but rather our aim is to contribute in a constructive way to the ideas as presented in this consultation document.

We have attended a number of DoJ consultation events on the Reducing Offending Framework and have participated in providing our feedback at these fora. We have also facilitated discussions with the Reducing Offending Team and young people in Woodlands JJC, Hydebank YOC and with young people from Include Youth's Give and Take Scheme.

The consultation paper is a very high level and aspirational document and we look forward to working with the Department on the next important stage of developing an implementation plan and ensuring that the words expressed become practice on the ground. In many respects the next stage of the process is the most important one and the one in which Include Youth fully intends to work alongside the Department, to bring ideas to fruition.

Do you agree with these core principles? Do you have any further comments about them?

Additional Core Principle on Rights:

We would suggest that a further principle should be added - compliance with international human rights and children's rights standards. This would be in line with and follow on from the framework on which the Youth Justice Review was conducted. The Reducing Offending Framework should be placed within the context of human rights and children's rights, as espoused in the UNCRC.

There exists an extensive and well developed body of both UN and European children's rights and human rights instruments and standards (binding and non-binding) relevant to youth justice. Include Youth has developed a briefing paper on these instruments and standards.²

The Strategic Framework should reference human rights and children's rights standards and include references to the core principles of the UN Convention on the Rights of the Child, including the best interest principle; the right to non-discrimination and the child's right to have their voice heard and listened to.

² Include Youth (2010) Briefing paper on Relevant International Human Rights Standards and Commentary on Youth Justice

This is particularly important given the Minister's acceptance of Recommendation 28 from the Youth Justice Review Team, to amend Section 53 of the Justice (NI) Act 2002 to fully reflect the best interests principles as espoused in Article 3 of the UNCRC.

Human rights and children's rights standards should be seen as a central benchmark against which all policy and practice emerging from the Reducing Offending Framework should be measured.

We believe that including this as a core principle would ensure that work emerging from the Reducing Offending Framework would promote and guarantee:

- Generic early intervention (at the point of need and regardless of age)
- Provision of universal services to ensure that children fulfil their potential, families are supported and the best interests of children are paramount regardless of age.
- Service provision that is preventative, steering children away from behaviour that might lead to offending.
- Service provision that is diversionary, securing creative and realistic alternatives to criminal justice.
- The need to ensure that the child's best interests are paramount in any decisions regarding budgetary allocation and the absolute need to prioritise funding for investment in early intervention and prevention.
- Participative working.
- Custody only being used as a means of last resort.

Encouraging Innovation:

We welcome this core principle and would suggest that there is much existing innovative and creative practice in the voluntary and community sectors. These important contributions should be recognised and sustained funding secured to enable their long term viability and to support them to deliver on the keys aspects of this strategy.

Evidence Based and Effective:

It is essential that the framework and activities emerging from it are informed by sound evidence and research whilst still allowing scope for innovation. The evidence and data provided in the document needs to be updated at regular intervals.

Focus on Prevention and Diversion:

We recommend that these are separated into two distinct principles and that a clear definition is given of what is meant by diversion. Include Youth recommend that it should mean diversion away from the criminal justice system.

This principle would benefit from a more detailed description of what the DoJ means by 'prevention' and 'early intervention'.

We agree that it is essential that the complexities of young people's lives are identified and understood and that appropriate, well resourced support is provided through early intervention measures. Such an approach targeted at promoting the well being of all children and characterised by universal services, holistic approaches and decriminalising responses comprise the most effective and least damaging forms of intervention and will subsequently minimise the necessity for intervention by the criminal justice system.

The phrase 'early intervention' is open to a number of interpretations, referring to the age of the child at which intervention is regarded as important or referring to the time at which problems begin to emerge in a child or young person's life. An inclusive interpretation would be one in which intervention is provided at the point at which a child or young person becomes vulnerable, regardless of age. We note that in page 12 of the Evidence Base paper that Early Intervention is referred to as 'both early years and early stage'.

We **recommend** that the framework adopts the same definition of early intervention as has been endorsed by CYPSP which is that early intervention is:

"intervening early and as soon as possible to tackle problems emerging for children, young people and their families or with a population at risk of developing problems. Early intervention may occur at any point in a child's life." (Grasping the Nettle Report 2009, CEO4)

Focus on Desistance:

We would welcome an agreed definition of the term 'desistance' as there is a danger that those in the sector are not working to the same definition.

Working in Partnership:

We agree that working in partnership is the key to success in delivery on the strategy. This should include partnership with other government departments and agencies and the voluntary and community sector.

Protecting the Public:

This is more of an aim than a principle.

Efficient Delivery

This has implications for a number of bodies, including the PSNI, PBNI and the courts. However, while we recognise the need to speed processes up, it is essential that this is not done in a way which will jeopardise children and young people's right to a fair trial.

The Context:

Statistics

In general, there is a dearth of comprehensive, easily accessible, up-to-date statistical information with regards to children and young people who come into contact with the criminal justice system. To gather information, it is necessary to contact each agency. This creates an unnecessarily complex and unwieldy system. Quarterly and annual statistical bulletins should be published recording young people's journey through the system. The data should include numbers, age and gender of young people arrested, offences, disposals, living situations and outcomes (e.g. re-offending).

Causes for Concern

We recommend that there is a specific mention of the youth reoffending rates. According to figures released by the NIO on 'youth reoffending', results from the 2008 cohort show that:

- the one year reoffending rate for all youth discharged from custody was 68.3%
- within six months 63% of those discharged from custody had re-offended on at least one occasion.³

Reference should be made to the disproportionate number of children in Woodlands JJC from a care background. Recent figures reveal that over one third of total admissions to the JJC are looked after children. The number of total admissions of looked after children under PACE rose from 50 in 2007-2008 to 72 in 2009-2010, despite attempts to reduce these numbers. Given that looked after children account for approximately 0.4% of the total population of children under 16 in NI, this statistic

³Youth Justice Agency: Results from the 2008 Cohort, Northern Ireland Office Statistics and Research Branch, Statistical Bulletin 2/2011.

reveals a disproportionate use of custody and in particular the use of PACE and remand on these children.⁴

“I’ve been in care since I was 6 years old, no-one really knows what I’ve been through.”

“Because things happen, like a close family member dies, ‘cos then you get in bad form and mix with a bad crowd and then you get into crime. Like, when I went into a care home, it was the people I mixed with. I wouldn’t have done crime before I went into a care home.”

Are there particular aspects of Government’s approach to reducing offending that you believe are working well and should be maintained?

Include Youth supports and is represented on the CYPSP and also on the 3 sub-groups on Offending, Early Intervention and Looked After Children. The CYPSP provides a multi-agency, integrated planning and commissioning approach and should be fully utilised as a mechanism to bring departments, agencies and the wider community and voluntary sector together, in their efforts to reduce offending.

Include Youth supports the work of Family Support Hubs and would strongly argue that they could be core delivery mechanism for early intervention and diversionary services. We commend the use of and support to restorative interventions such as family group conferencing and Community Based Restorative Justice. The Youth Justice Review Team made a recommendation on the need to “build on the successful practice of community based restorative justice schemes”.⁵ This is in line with Include Youth’s recommendation to the review on the need for continued and sustained support for existing community based restorative justice programmes and the availability of community run restorative justice processes in all communities in NI.

Are there any other key strategic drivers which you consider need to be included?

While we welcome the brief reference to the work of the CYPSP on page 18 of the document, we would emphasize the need to fully acknowledge and draw on the

⁴ Include Youth Submission to the Youth Justice Review Team’s Review of the Youth Justice System in NI, 2011.

⁵ Department of Justice, 2011, A Review of the Youth Justice System in NI, p7.

opportunities that this partnership presents to delivering on this strategy. No mention is made of the existence and work of the CYPSP Children and Young People and Offending Sub-Group or the Early Intervention Sub Group, and in particular of the Draft Action Plan these groups have developed. As the strategic document states, this group brings together all the key agencies who have responsibility for improving outcomes for children and young people, as well as representatives from the voluntary and community sector. This group provides an important opportunity for joint planning and commissioning, which Include Youth see as a critical factor in the successive outworking of this strategy.

A number of strategies have been mentioned in the paper and others will be added in the period of this framework. The test of this work will be how the DoJ works in partnership with other government departments and their agencies. In the next section we emphasise the importance of this strategy being included within the work of Delivering Social Change.

How can Government better join up all the strands of activity?

In our submission to the Youth Justice Review we emphasised the need for the Review of Youth Justice to examine underlying issues, many of which fall outside of the remit of the Department of Justice and sit within health, education, social development or employment and learning.

We support Recommendation 3.b in the Youth Justice Review which deals with the need to identify and remove barriers to pooled funding and collaborative working. In our view this is absolutely critical to the effectiveness of mainstreamed early intervention and preventative work.

We would also like to see within the Framework the recommendation on the need to legislate for a statutory duty to co-operate.

Despite some positive developments in relation to collaboration and joined up working across government departments, including the recent introduction by OFMDFM of the Delivering Social Change programme, government departments in Northern Ireland have a long history of working in 'silos', with any collaborative working largely dependent on informal relationships and the commitment of individuals. Funding has tended to be provided and allocated for the delivery of services specific to each department and in order to meet statutory responsibilities rather than with the aim of achieving shared outcomes for children and young

people. Collaboration and joined up working are neither mainstream experiences nor are they expected in relation to the functioning of government departments. Where collaboration exists, it is based on informal relationships and the goodwill of individuals. Leaving co-operation to be taken forward on a voluntary basis, rather than creating a statutory duty, ignores political and structural realities and risks maintaining the status quo of inconsistent and insufficient results. Creating a statutory duty to co-operate would permit government departments and agencies to pool budgets and jointly commission services. This would make it easier for departments to work collectively towards shared outcomes and would also provide for more straight-forward investment in early intervention and preventative spending.

In our view it is only through a statutory duty to co-operate that the type and level of co-operation required to ensure that early intervention and prevention is firmly mainstreamed across government will be achieved. Placing the duty to co-operate on a statutory footing would give the Children and Young People's Strategic Partnership the 'muscle' that they ultimately require.

Furthermore, the Reducing Offending Strategic Framework should be placed as one of the strands with the Delivering Social Change model. Placing the Reducing Offending Framework within Delivering Social Change will in effect bring to life the commitment made in the Programme for Government and will make partnerships between government departments, statutory agencies, voluntary and community sector real and productive.

Do you agree with the structure and content of the Strategic Framework?

We broadly agree with the structure and content of the framework, but developing the detail around the implementation plan will be critical. We fully support the spirit and intention of the framework. We welcome the Department's willingness and commitment to draw attention to the root causes of offending behaviour and applaud the Minister's efforts to engage with other Department's on this matter. The outworking of the strategy will be an enormous challenge.

1. Tackling the Social Determinants of Crime

We absolutely agree with the statement that:

"Crime, and the challenge of reducing crime, is not the responsibility of the DoJ alone".

We agree that tackling unemployment, low educational attainment, housing problems and poverty would undoubtedly reduce levels of offending.

But it is clear that taking action on these issues is not within the gift of the DoJ. These issues must be addressed by other government departments – namely DEL, DETI, DE, DHSSPS, DSD, OFMDFM. The contribution of DE and DHSSPS cannot be underestimated. These Departments must embrace and demonstrate a genuine willingness to tackle these challenging issues. The question remains, how will this co-operation be achieved?

2. Prevention and Diversion

We welcome the recognition that the DoJ has of the fact that children who are at risk of offending often face a plethora of multi layered problems in their lives – whether that be in their family, in their community, around mental health and around alcohol and drug abuse. Low educational attainment and social exclusion should be included under the supporting evidence.

Currently the youth justice system has played a significant and lead role, in providing responses to these children and their families. In part this has been because resources were available within the criminal justice system, and there exists an understanding among professionals within the youth justice system of the need to keep children out of the system. In addition, the NI system has largely followed the UK government's prevention agenda, which has resulted in net widening.

It is our firm belief that intervention services should be supported, but not directed by the justice system in NI but rather through genuine collaborative partnerships, which will include other government departments, such as DE, DHSSPS, DEL, DSD, other relevant departments and agencies and the voluntary and community sectors.

It is essential that emerging policy and practices should avoid stigmatising or criminalising children, young people and their families for welfare based concerns. Support services should be provided through a social care framework and delivered by voluntary sector providers in partnership with local communities, families, children and young people. These services should not be delivered by criminal justice agencies but by a range of relevant government bodies.

Minimum Age of Criminal Responsibility:

Include Youth has already made its views known on the need to increase the MACR. Increasing the MACR would lead to a substantial reduction in the number of children and young people entering the criminal justice system. We support the Youth Justice Review Team's recommendation that the age should be raised to 12 with immediate effect. However, before the age of criminal responsibility can be raised to 12 it is essential that the necessary support services for children, their families and their communities are already in place.

3. Reducing Opportunities to Commit Crime:

This section should include a definition of anti-social behaviour and make reference to the various perceptions and misconceptions about what constitutes anti-social behaviour.

While we agree with the need for the public to be made aware of crime prevention, we would like to see Public Awareness Campaigns used to educate the general public about wider issues, such as making them aware of the advantages of alternatives to custody and the importance of rehabilitation and reintegration strategies and restorative practices.

4. Effective Delivery of Justice

Speeding Up Justice:

We note in the Evidence paper that reference is made to the comprehensive programme of work that has been put in place to speed justice up, including those proposals under youth cases. Include Youth have been involved in the stakeholders meeting around Speeding Up Justice and have recently registered our concerns with the Blueprint for Improving Processes for Youth Cases. It is our view that while this initiative has the potential to avoid delay and divert children and young people from the criminal justice system, as it currently stands it is incompatible with the recommendations from the youth justice review and may compromise the child's right to a fair trial.

It is unfortunate that this initiative which has the potential to bring real change is being rushed in without adequate consultation. This approach seems to be at odds with the principles outlined in the Reducing Offending Strategic Framework, and more worryingly suggests that there needs to be improved communication and commitment to work to a shared vision even within the DoJ, never mind fostering this across other Departments.

While we welcome the proposals to introduce statutory time limits (STL) we are disappointed that the Department has not adopted the full recommendation on this matter from the youth justice review. The suggested timeframe for the 120 day STL is from charge to disposal rather than arrest to disposal as recommended by the Review Team.

5. Reducing Reoffending:

Reintegration and Rehabilitation is a key aspect of the youth justice system, and we would have expected the Strategic Framework to place a much greater emphasis on it. We concur with the findings of the Youth Justice Review that reintegration and rehabilitation are not high priorities for government and consequently are not well resourced.

While the document details the one year reoffending rate in NI and compares it favourably with the rate in England and Wales, it does not reference the reoffending rate for young people, which is significantly higher.

This section should make reference to the importance of meeting the educational and training needs of young people in custody, as well as employment. This is particularly urgent for those young people currently held in the YOC. While the evidence paper does state that 'The Prison Service is committed to working with its key partners and staff in prison establishments to develop and embed a learning and skills culture that encourages inmates to make the best use of vocational and educational services', it does not reference the number of reports that have been critical of current educational provision.

The IMB have stated that they 'remain concerned by the number of prisoners who have very poor levels of literacy and numeracy so recommends that priority is given to addressing this by providing adequate sessions of education in essential skills... more needs to be done so the Board recommends the number and variety of courses provided should be significantly extended in order to give purposeful and useful activity to all prisoners.'⁶

The CJINI have also stated that the 2011 inspection showed that capacity in the vital area of learning and skills was significantly underutilised: most classes had less than 5 learners, average attendance was 50% and there were serious staff shortages.⁷

⁶ IMB, Hydebank Wood Prison and Young Offenders Centre, Annual Report for 2010/2011, p11.

⁷ CJINI, An Inspection of Prisoner Resettlement by the Northern Ireland Prison Service, October 2011, p25.

The Evidence Paper refers to the draft NIPS Employability Strategy (page 46 point 140). It is also listed as an example of a recent achievement on page 14 of the Reducing Offending Framework consultation document. Include Youth will be submitting a response to this consultation and raising a number of issues of concern.

We are concerned that there is a complete failure to recognise the specific needs of young prisoners within the proposed policy. 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.

These young people are particularly vulnerable and a number of significant reports, including the Owers report and reports by the CJINI 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*”⁸ 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*”.⁹

These criticisms echoed an earlier negative assessment provided by the CJINI in 2011. The CJINI report recommended that a dedicated education and training policy for young people be developed.¹⁰

The experiences of young people consulted with by Include Youth reinforced the findings of these reports¹¹:

“You can get qualifications in bricklaying or plumbing or that, but it depends if you get onto them or not – you can put your name down and there could be 30 or 40 people on the list in front of you”

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

⁸ Prison Review Team (2011) Review of the Northern Ireland Prison Service: Conditions, Management and Oversight of all Prisons page 70

⁹ Ibid page 72

¹⁰ CJINI, 2011, Inspection of Hydebank Wood Young Offenders Centre and Women’s Prison.

¹¹ Include Youth consultation with young people in Hydebank Wood Young Offenders Centre July 2012

“I was told that it’d be 10 days after I moved in (new landing) that I’d get to go back to education, but it’s been 3 weeks and nothing’s happened”

We agree that sustainable employment is a key factor in reducing reoffending and this is evidenced by the work of our Give and Take Scheme and our commitment to helping young people improve their chances at accessing training, education and securing employment opportunities.

There is a deficit in provision of appropriate training and pre-employment programmes which have the necessary skills and knowledge to engage with custody experienced young people, similar to that provided by Include Youth and NIACRO.

The Reducing Offending Strategy must address the specific employability needs of young people and work with other relevant departments to ensure that specific objectives and actions are developed to meet these needs.

Practical Suggestions from young people regarding what may support them to cease offending:

- More programmes which include activities and events.
- Support to access education, training and employment.
- Support in tackling drug and alcohol abuse.
- Support from a key worker who can advocate for them and guide them through the maze of orders and conditions.

“See if I had a job, I wouldn’t do any crime.”

“You need support – to get a job and stay off drugs, help to try and get on with your life.”

“you need jobs, that would get you sorted.”

“there should be work out there, businesses, who would take you on and give you a chance.”

“In 10 years I will be 26 – I will have a record that will stick with me for the rest of my life.”

The Minister has set out an ambitious reform agenda that will require significant effort to deliver over the next three years. Are there particular

elements of the framework that you believe require urgent attention over the next three years in addition to these priorities?

There is an urgent and somewhat overdue need to develop genuine collaborative working across government departments and also with community and voluntary sector. It is our experience that while government departments openly seek to work in partnership with voluntary and community sectors, the outworking of this can fall far short of the type of genuine collaboration that is required. Voluntary organisations often feel that they are not being involved in an open and participative way. If government departments are to learn from the effective working practices, experience and wide ranging practice base that voluntary organisations have, they must involve them from the outset of any initiative, and treat them as equal partners in the process.

We would urge the Department to draw on the lessons learnt from those models of collaborative working that have proved to deliver. One such example which Include Youth has been involved in is the Looked After Children in Education (LACE) project. In brief this was a partnership of 4 government departments and 4 voluntary sector organisations. Working together significant cultural, policy and process changes have been achieved which has heralded tangible and marked improvements in the educational outcomes for looked after children.

We would also applaud the Minister for taking the first steps towards trying to develop joined up working on this issue. The challenge for the DoJ will be to convince and persuade their external stakeholders that this approach can deliver results for both those young people who are caught up in the justice system and those members of society who have suffered as a result of criminal actions – to make known the fact that the DoJ believes that ultimately this approach will result in safer communities. Securing commitment from the key departments of Health and Education is critical.

Early consensus across government departments on the actions emerging from the framework is essential.

All steps necessary should be taken to ensure that Community Based Restorative Justice schemes are supported and are as effective as possible in dealing with low level offending by children and young people outside the formal criminal justice system.

“Give us a chance”

“Don’t lock us up everytime.”

Which elements of the framework should be considered as priorities for the medium and longer term (i.e. the next four to ten years)?

- The development of integrated commissioning for Early Intervention and Prevention.
- The development of intensive, non punitive, non stigmatising, non justice based intervention.

Do you have any comments on how the community can best support people to move away from criminal behaviour?

The community plays a vital role in supporting young people to move away from criminal behaviour.

Community groups struggle to sustain the good and innovative work they are doing due to financial constraints. These projects need sustained financial support and there needs to be a streamlining of application procedures for funding for these groups.

Funding should be redirected from the justice system to the community and voluntary sector.

Efforts need to be made to demonstrate to the community that alternatives to custody and a non punitive, restorative approach can work and deliver better results. The restorative practices that are proving to work best are those that are based in the community. Government departments need to link in to those community networks.

The DoJ should embark on a public awareness raising campaign, outlining the thinking behind the Reducing Offending Framework. This should involve dialogue with victims and communities and should address the misconception that this approach is about ‘going soft’ on crime. Prevalent prejudices about the people who commit crime need to be tackled and challenged.

Section 6: Outputs and Outcome Indicators

Outputs

What are your views on exploring a Reducing Offending Task Force/ Strategic Partnership model?

The Strategic Partnership model should follow an approach akin to the CYPSP and should encompass the Community Safety steering group and the implementation group which will be set up to oversee the next stage of the youth justice review.

Outcomes

Do you agree with outputs?

We agree with the outputs listed and regard them to be predominantly process driven.

Do you agree with outcomes?

We agree with the outcomes listed, but would like to see more detailed outcomes emerging from the ones listed which are more measurable and realistically achievable. For example, how many 'fewer' first times young offenders will enter the justice system? By how much will repeat victimisation be reduced? What will represent a 'statistically significant' reduction in reoffending?

A prerequisite for monitoring and evaluating progress on outcomes is the availability of baseline information. It is essential that we have the necessary statistics and evidence to monitor progress.

Conclusions

Include Youth welcomes the opportunity to comment on this document and to have been involved in the consultation process that facilitated discussions between staff from the Reducing Offending Team and young people. We fully intend to continue our engagement with the Team and look forward to working on the next stage of the implementation plan for the framework. We have no doubt about the scale of the challenge that lies ahead and in particular the difficulty there will be in securing the necessary buy in from all relevant stakeholders. However, we are committed to working in partnership with the DoJ and to do everything we can to influence and persuade key stakeholders that implementing this strategy is of the utmost importance. We must see tangible actions following on from the words in the framework. As the quote from the young person on the front cover of our submission clearly demonstrates, the price of not making this work is too high to pay. If a young

woman of 15 years of age is so astute as to recognise that those of us in the sector have been talking about what needs to happen to change things for many years, without any noticeable improvement, then it is incumbent on us to prove her wrong. We know what will make a difference. We have known for some time what will make a difference. It is now time to act on that knowledge.