



Llywodraeth Cymru
Welsh Government

Number: WG44245

The Welsh Government
Consultation Document

Substance Misuse Treatment Framework and Standards for Mental Health Services for Prisons in Wales

Date of issue: 22 July 2022

Action required: Responses by 14th October 2022

Mae'r ddogfen hon ar gael yn Gymraeg hefyd /
This document is also available in Welsh

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Overview

The Welsh Government is consulting on a new Substance Misuse Treatment Framework (SMTF) and new standards for mental health services, for the prisons in Wales. The new SMTF and the new standards aim to help ensure there is equivalence in place for people in prisons, in terms of access to substance misuse and mental health care, support and treatment. The development of the SMTF and the new standards for mental health services form part of the Partnership Agreement for Prison Health, which sets out agreed priorities for the health and wellbeing of those in prison in Wales.

How to respond

Please respond by completing the online form or by using the questionnaire at the back of the document and sending this to the Welsh Government's Substance Misuse Mailbox.

<https://gov.wales/draft-substance-misuse-treatment-framework-and-standards-mental-health-services-prisons>

<https://llyw.cymru/fersiwn-ddrafft-or-fframwaith-trin-camdddefnyddio-sylweddau-safonau-ar-gyfer-gwasanaethau-iechyd>

Substance.Misuse@gov.wales

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

For further information:

Mental Health, Substance Misuse and Vulnerable Groups Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ
Email: Substance.Misuse@gov.wales

This document is also available in Welsh:

<https://llyw.cymru/fersiwn-ddrafft-or-fframwaith-trin-camdddefnyddio-sylweddau-safonau-ar-gyfer-gwasanaethau-iechyd>

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In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

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Cathays Park
CARDIFF
CF10 3NQ
e-mail:
Data.ProtectionOfficer@gov.wales

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Commissioner's Office are:

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 01625 545 745 or
0303 123 1113
Website: <https://ico.org.uk/>

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Foreword

Providing effective, high quality and sustainable healthcare – along with protecting, rebuilding and developing our services for vulnerable people – are two of the ten well-being objectives set out in our [Programme for Government 2021-2026](#).

Developing a healthier Wales is also one of the seven well-being goals which underpin the [Well-being of Future Generations \(Wales\) Act 2015](#) recognising the critical importance of having a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are considered. As illustrated by the unequal impacts of the recent Covid-19 pandemic and its disproportionate effect on certain groups, we also know that we need to do more to support those with poorer health outcomes and reduce those health inequalities which currently exist.

Evidence suggests that one of the groups at risk of poorer health outcomes are people in prison. In particular, they will often have a higher prevalence of substance misuse and poorer mental health, as well as a higher prevalence of Adverse Childhood Experiences and trauma. A [2018 study by Public Health Wales](#) to understand the prevalence of Adverse Childhood Experiences amongst the male offender population found that over 8 in 10 prisoners in Wales reported at least one Adverse Childhood Experiences, and nearly half had four or more. These and other challenges facing the prisoner population in Wales were recently highlighted by the Health, Social Care and Sport Committee in their [inquiry into health and social care in the prison estate in Wales](#).

With the view to improving health outcomes and reducing those health inequalities which currently exist, the Welsh Government has worked with Public Health Wales and the Royal College of Psychiatrists to develop a new Substance Misuse Treatment Framework and new standards for mental health services for our prisons in Wales. The policies are priorities in the [Partnership Agreement for Prison Health](#) – which was developed collaboratively between the Welsh Government, Her Majesty's Prison and Probation Service (HMPPS) in Wales, Health Boards and Public Health Wales – to support the fundamental principle of equivalence and ensure people in prison have access to the same levels of support and healthcare as those in the community.

The development of the SMTF and the new standards for mental health services are also important in the context of the recently published UK Government [Prisons Strategy White Paper](#) (December 2021) – as well as recent recommendations made by the Criminal Justice Joint Inspection (with the Care Quality Commission and Health Inspectorate Wales) of the [criminal justice journey for individuals with mental health needs and disorders](#), and Her Majesty's Inspectorate of Prisons (HMIP) thematic inspection of [community-based drug treatment and recovery work with people on probation](#). These recognise the critical role of both substance misuse and mental health services, particularly in the context of recovery from the pandemic, and ongoing support and rehabilitation for people in prison and the community.

The SMTF and the new standards for mental health services for the prisons will align with other work being taken forward – including our continued investment into substance misuse and mental health services in the community, new funding to tackle homelessness and to provide effective and sustainable housing solutions to those most at risk, and ongoing action to support those with complex needs (including those with co-occurring substance misuse and mental health problems). It will also align with the principles set out in the Youth Offending Blueprint and the Female Offending Blueprint, as well as the work of Traumatic Stress Wales and their [Prison and Criminal Justice workstream](#) that aims to build capacity to identify and assess traumatic stress within the prisons in Wales, and to increase access to effective psychological therapies. This also includes support for the training of frontline staff in trauma-enhanced practice and supporting effective transitions back into community services.

We know there are likely to be challenges to implementing the new SMTF and the new mental health standards, particularly within the context of the ongoing pandemic and recovery. However, we are committed to working with the health boards and other partners to overcome these – with the view to 2022 being an interim year for their implementation across the six prisons in Wales.

Building on the engagement we have had to date with the prison health teams, health boards, HMPPS in Wales, and substance misuse and mental health stakeholders – consulting at this point provides us with the opportunity to further strengthen our commitment to protecting the health and wellbeing of people in prison and deliver a whole prison approach to improving health outcomes and rehabilitation. We look forward to hearing your views.

Background to the consultation

The Welsh Government is consulting on a new Substance Misuse Treatment Framework (SMTF) and new standards for mental health services in the prisons in Wales. The development of the SMTF and the new standards for mental health services in the prisons are priorities set out in the [Partnership Agreement for Prison Health](#) developed and agreed by the Welsh Government, Health Boards, Public Health Wales and HMPPS. The Partnership Agreement aims to drive improvements in the health and wellbeing of people in prison in Wales, recognising the unique statutory obligations of key partners. It aims to build on the shared objective of ensuring those in prison can live in environments that promote health and wellbeing and where health services can be accessed to an equivalent standard of those within the community.

What are the main issues?

People in prison often have poorer health outcomes in comparison to the wider population, who frequently present with complex needs and high levels of ill health, often as a result of health inequalities (WHO, 2014).¹ In particular, people in prison are known to have higher rates of substance misuse and homelessness prior to going to prison, as well as a higher prevalence and severity of mental health problems. An estimated 25% of the UK prison population have difficulties in communicating and/or processing or learning new or complex information resulting in potentially increased vulnerability within the prison environment as well as on release. Those in prison also have a 50% higher mortality rate than the general population² and a risk of suicide 3.7 times higher than the general population amongst men in prison.³

¹ Anders (2017) Rebalancing Act: A resource for directors of public health, police and crime commissioners, the police service, and other health and justice commissioners, service providers and users, Revolving Doors Agency, London. Available at: https://www.basw.co.uk/system/files/resources/basw_91153-9_0.pdf

¹ WHO (2014) Prisons and Health, World Health Organisation, Copenhagen. Available at: [Prisons and health \(who.int\)](#)

² Revolving Doors Agency (2017) Rebalancing Act: A briefing for Directors of Public Health, Police and Crime Commissioners, the police service and other health and justice commissioners, service providers and users. Available at: https://www.basw.co.uk/system/files/resources/basw_91153-9_0.pdf

³ Office for National Statistics (2019) Drug-related deaths and suicide in prison custody in England and Wales: 2008 to 2016. Available at: [Drug-related deaths and suicide in prison custody in England and Wales - Office for National Statistics](#)

Developing the SMTF and the new standards for mental health services will help to ensure that while a person is in prison, they have access to equivalent care and treatment to that available in the community. It will also help to support people in prison to improve their health and wellbeing and make an important contribution to reducing those inequalities in outcomes which currently exist.

In Wales there are currently six male-only prisons. Welsh women in custody must serve their sentence in English Prisons, predominantly in Eastwood Park, Gloucester and HMP Styal. There are also no category A (high security) prisons in Wales. Category A offenders (and others from Wales) will be required to serve their sentences in prisons in England, returning to Wales on release, or potentially prior to release for male non-category A offenders. As such, the SMTF also gives consideration to addressing the needs of men and women being resettled into their communities⁴ in Wales post-release, in line (for example) with the priorities set out in the Women in Justice Blueprint for Wales. Similar considerations in relation to transition to the community are included in the draft standards for mental health services.

Where are we now?

Following the development of the Partnership Agreement for Prison Health in 2019, the Welsh Government commissioned Public Health Wales to develop the SMTF for the prisons, and the Royal College of Psychiatrists to develop the new standards for mental health services. Public Health Wales and the Royal College of Psychiatrists worked with the health teams in the prisons, HMPPS, the health boards and third sector organisations to develop initial drafts of the documents by early 2020. Both work streams were then paused in light of the pandemic until autumn 2021, when further engagement work was undertaken to develop the draft documents.

The Welsh Government is now consulting on the draft SMTF and the draft standards for mental health services with the view to engaging more widely on the two documents and providing an opportunity to discuss plans for implementation with stakeholders in Wales.

Following this joint consultation on the two documents, the intention is for 2022 to be an interim year for the implementation of the SMTF and the standards for mental health services. The Welsh Government will work with the prisons and health boards in Wales to form next steps and timeframes – based on consultation feedback. We anticipate that following the consultation the health boards and the prisons in Wales will need to undertake a gap analysis to identify key actions to support delivery. Further support for delivery will also be available for the prisons through other developments, such as the Traumatic Stress Wales initiative and its focus on

⁴ Welsh Government and Ministry of Justice. 2019. Female Offending Blueprint for Wales. Available at: <https://gov.wales/supporting-female-offenders>

supporting those in prison who have experienced trauma to access the support and treatment they need.

Evidence for change: Improving the health outcomes of people in prison

In 2019, the Welsh Government consulted on two new Delivery Plans – one for Substance Misuse and one for Mental Health. During both consultations, prisoner health and wellbeing was highlighted as a key issue. [The Substance Misuse Delivery Plan 2019-22](#) issued for consultation included the priority action to ensure that all prisons in Wales (and all English prisons where Welsh women are held) have a coordinated, transparent and consistent service for those with substance misuse problems in prison. Stakeholders responding to the consultation were supportive of this priority recognising the need to strengthen the referral pathways from custody into community services for both substance misuse and mental health services, with the view to improving support for those with co-occurring (mental health and substance misuse) and substance misuse in prisons.

There was also support for offenders and people in prison being identified as a vulnerable group within the [Mental Health Delivery Plan 2019-22](#), recognising the inequalities faced by this group, their poorer mental health outcomes and specific health needs. Calls were also made for a focus on the needs of older prisoners and young people; investment in staff training and resources; and a greater emphasis on early intervention and prevention.

Similar support and evidence for change regarding care, support and treatment for those in prison, particularly in relation to substance misuse and mental health, was provided to the Health, Social Care and Sport Committee in Wales, following their inquiry into health and social care provision in the adult prison estate in Wales.⁵

The Committee's inquiry included a focus on the demand for health and social care services in Welsh prisons, and whether health care services are meeting the needs of prisoners and tackling the health inequalities of people detained in Welsh prisons. The Committee Report highlighted that the additional levels of need among the prison population compared to the wider community was a consistent theme throughout their inquiry.⁶

The Committee Report also noted that there can be “particular challenges in assessing the health and social care needs of people serving short sentences, and in delivering the appropriate care and support interventions” (paragraph 63) – and

⁵ [Health, Social Care and Sport Committee \(March 2021\) Report on Health and Social Care in the Adult Prison Estate in Wales](#)

⁶ Paragraph 58 [Health, Social Care and Sport Committee \(March 2021\) Report on Health and Social Care in the Adult Prison Estate in Wales](#)

that the need for continuity of health and social care services on an individual's transition from the community into a prison, and back into the community on release, was particularly important. The Committee also stated that while they welcomed assurance from HMIP that "prison health care in Wales is generally of a reasonable standard, and is improving", they remained concerned that "there are still gaps in key areas such as mental health and substance misuse services, in particular as these are areas where the needs of the prison population are likely to be greater than those in the wider community".⁷

The Committee's 2021 Report specifically recognised that: "The COVID-19 pandemic has had a significant impact on the prison population in Wales, and on the time and resources available to progress the priorities in the Partnership Agreement [for Prison Health]. However, unless work to deliver the identified priorities is progressed as a matter of urgency, the objective of driving improvements in the health and wellbeing of people held in Welsh prisons will be at risk."⁸

The Service Framework for the Treatment of People with a co-occurring mental health and substance misuse problem recognises that individuals with complex needs require a co-ordinated approach from a range of primary and/or secondary care services, delivered in both statutory and non-statutory settings.⁹

In 2019-20 and 2020-21, the Welsh Government allocated an additional £1.3m in services for people with housing and complex needs, with a focus on supporting people experiencing homelessness. The Substance Misuse Delivery Plan 2019-22 contains a number of actions to ensure we reach those people most in need of support, including people with co-occurring conditions, homeless and older people. Continuation of £1m of funding for Complex Needs continued in 2021-22.

In addition, the 2021 Prisons Strategy White Paper highlighted how an offender's complex needs may disproportionately affect their experience in prison as well as life after release. The Paper calls for "a new model of mental health service provision"¹⁰ for high-risk offenders with the most complex needs and recognises the importance of wraparound support and a connection with community mental health services.

The paper also calls for the recognition of women in custody whose complex needs can differ dramatically from their male counterparts. Women often enter the criminal justice system with complex needs, and many have been victims of domestic abuse

⁷ Paragraph 73 [Health, Social Care and Sport Committee \(March 2021\) Report on Health and Social Care in the Adult Prison Estate in Wales](#)

⁸ Page 5 (Forward) [Health, Social Care and Sport Committee \(March 2021\) Report on Health and Social Care in the Adult Prison Estate in Wales](#)

⁹ [Welsh Government \(2015\) Chapter 3 Service Framework for the Treatment of People with a Co-occurring Mental Health and Substance Misuse Problem](#)

¹⁰ Paragraph 124 [Prisons Strategy White Paper \(December 2021\)](#)

and suffer from trauma and mental health issues as a result. This can often be a driving factor in offending.¹¹

The development of the SMTF and the new standards for mental health services in the prisons will make an important contribution to addressing these challenges and will also ensure the development of appropriate services and support for a group that are particularly in need.

Summary – SMTF for the Prisons in Wales

As set out in the [Partnership Agreement for Prison Health](#) – the SMTF develops a substance misuse pathway that addresses both clinical and psychosocial provision in Welsh prisons. It will drive forward an integrated approach between health and justice roles that runs from reception through to release regardless of sentence length.

The draft SMTF is designed to inform and assist health, social care and criminal justice planners and providers to design and deliver high quality, sustainable and equitable prevention and treatment services for those at risk of, or experiencing substance misuse issues in prison. It forms part of the suite of harm reduction and Substance Misuse Treatment Framework (SMTF) [guidance](#) for those working in Wales.

Chapter 2 of the draft SMTF sets out the clinical treatment pathway, from initiation and assessment to follow-on care and support following release from prison, for both alcohol and drugs. It also includes a specific section on co-occurring drug and alcohol dependence and mental health. As an individual may have both problematic drug and alcohol use, the assessment process and pathway is designed to be flexible and inclusive – through to follow-on support and relapse prevention.

Chapter 3 briefly outlines the guidance for resettlement, while Chapter 4 provides a focus on the required workforce developments including realignment and training. In order to move to an equitable and seamless substance misuse service, substantial changes are required in relation to technological innovation, information governance and data flows covering both community and criminal justice settings.

Chapter 5 outlines the requirements to access information systems to facilitate the delivery of an ‘excellent, safe and equivalent service to that in the community’¹² in relation to substance misuse and related health and social care requirements.

¹¹ Paragraph 153 [Prisons Strategy White Paper \(December 2021\)](#)

¹² World Health Organisation. Health in Prisons. Available at: [Prisons-and-Health,-14-Drug-treatment-and-harm-reduction-in-prisons.pdf](#)

Summary – Standards for Mental Health Services for the Prisons in Wales

As set out in the [Partnership Agreement for Prison Health](#) – the new standards for mental health services in the prisons will develop consistent mental health, mental well-being and learning disability services across all prisons that are tailored to need.

The Universal Standards set out in the consultation document act as a framework by which to assess the quality of prison mental health services via a process of self and peer review. The standards have been adapted from the Royal College of Psychiatrists, College Centre for Quality Improvement (CCQI) Quality Network for Prison Mental Health Services (QNPMHS) standards.¹³

The standards are introduced by a section on Enabling Environments, which are based on ten values, all of which are believed to be factors in positive psycho-social environments. Enabling Environments¹⁴ are places where there is a focus on creating a positive and effective social environment and where healthy relationships are seen as the key to success.¹⁵ Places which are enabling create more opportunities and better outcomes for everyone there. They create happier, more productive staff; better outcomes for individual recipients; and support everyone to give greater contributions and to be the best they can be. These values depend on each other for meaning and for clarity. Taken individually, each value will enhance an environment, but it is not until they are all working together, they create an Enabling Environment. Each of the 10 values are defined by a standard, and for every standard there are criteria which are ways in which services can meet that standard.

There are new standards on strengthening collaborative working with primary care and substance misuse services; with specialist prison programmes such as therapeutic communities and offender personality disorder pathways; and knowledge of the principles of trauma informed care. Therefore, the draft mental health standards focus on:

- Reception and assessment – including arrangements for the assessment of former users of secondary mental health services
- Treatment and recovery
- Discharge and transfers
- Safety
- Patient experience
- Collaborative partnerships

¹³ [Royal College of Psychiatrists \(August 2021\) Standards for Prison mental Health Services – Fifth Edition](#)

¹⁴ [The Perceived Impact of the Enabling Environments Programme within Her Majesty's Prison and Probation Service Settings](#)

¹⁵ [Evidence-based reasons for embedding 'Enabling Environments' relational practice into the Criminal Justice System](#)

- Medication management
- Wider prison environment
- Workforce
- Leadership and governance
- 24 hour mental health care
- Welsh Language

Condition Specific Standards for mental health are also being developed through a network approach taking learning from prison teams in Wales. These Condition Specific standards will include Brain Injury, Learning Disability, Autism, Dementia and Crisis Care. However, approaches to support condition specific care are also present within the Universal Standards.

Within the document, each individual standard is rated as Type 1, 2 or 3. Type 1 are Essential Standards. Failure to meet these would result in a significant threat to patient safety, rights or dignity and/or would breach the law. These standards also include the fundamentals of care, including the provision of evidence-based care and treatment. Type 2 are Expected Standards that all services should meet. Type 3 are Desirable Standards that high performing services should meet.

Engagement

In developing the draft SMTF and standards for mental health services in the prisons, Public Health Wales and the Royal College of Psychiatrists have engaged with the HMPPS, health boards and third sector, the prison health teams and other stakeholders (including substance misuse services and providers in the prisons and the community). This engagement will continue post consultation for the development of implementation plans and actions to support delivery – alongside specific engagement with those with lived experience. For example, engagement through existing groups in place in the prisons in Wales, as well as with people who are receiving support from substance misuse or mental health services (or have done previously) in the community. This includes engagement with peer support groups – such as those established to support recent research on the impact of Covid-19 on people with substance misuse problems and the services that support them, carried out by the University of South Wales.¹⁶ For the mental health standards – we will continue to support the prisons by establishing a specific network, where there will be an emphasis on sharing good practice and peer review.

¹⁶ A [collaborative research project](#) on the impacts of the pandemic was recently undertaken by a partnership of staff and peer workers from the University of South Wales (USW) and support from organisations such as [Barod](#) and [Kaleidoscope](#), with assistance from the Welsh Government and [Developing a Caring Wales](#) (DACW).

Consultation Response Form

Your name:

Organisation (if applicable):

email / telephone number:

Your address:

Question 1: Do you agree with the structure and content of the clinical treatment pathway set out in Chapter 2 of the SMTF – and its focus assessment, follow-on care and treatment, and support following release from prison – for both alcohol and drugs?

Strongly Agree

Somewhat Agree

Neither Agree nor Disagree

Somewhat Disagree

Strongly Disagree

If there is information you would like to provide that supports your response to question 1, please include this here.

Question 2: Do you agree with the focus of the guidance for resettlement set out in Chapter 3 of the SMTF?

Strongly Agree

Somewhat Agree

Neither Agree nor Disagree

Somewhat Disagree

Strongly Disagree

If there is information you would like to provide that supports your response to question 2, please include this here.

Question 3: Do you agree with the required workforce developments set out in Chapter 4 of the SMTF?

Strongly Agree

Somewhat Agree

Neither Agree nor Disagree

Somewhat Disagree

Strongly Disagree

If there is information you would like to provide that supports your response to question 3, please include this here.

Question 4: Do you agree with the requirements around access to information systems set out in Chapter 5 of the SMTF?

Strongly Agree

Somewhat Agree

Neither Agree nor Disagree

Somewhat Disagree

Strongly Disagree

If there is information you would like to provide that supports your response to question 4, please include this here.

Question 5: Do you agree with the proposed universal standards for mental health services in the prisons and their focus on the following areas:

- Reception and assessment – including arrangements for the assessment of former users of secondary mental health services
- Treatment and recovery
- Discharge and transfers
- Safety
- Patient experience
- Collaborative partnerships
- Medication management
- Wider prison environment
- Workforce
- Leadership and governance
- 24 hour mental health care
- Welsh Language

Strongly Agree

Somewhat Agree

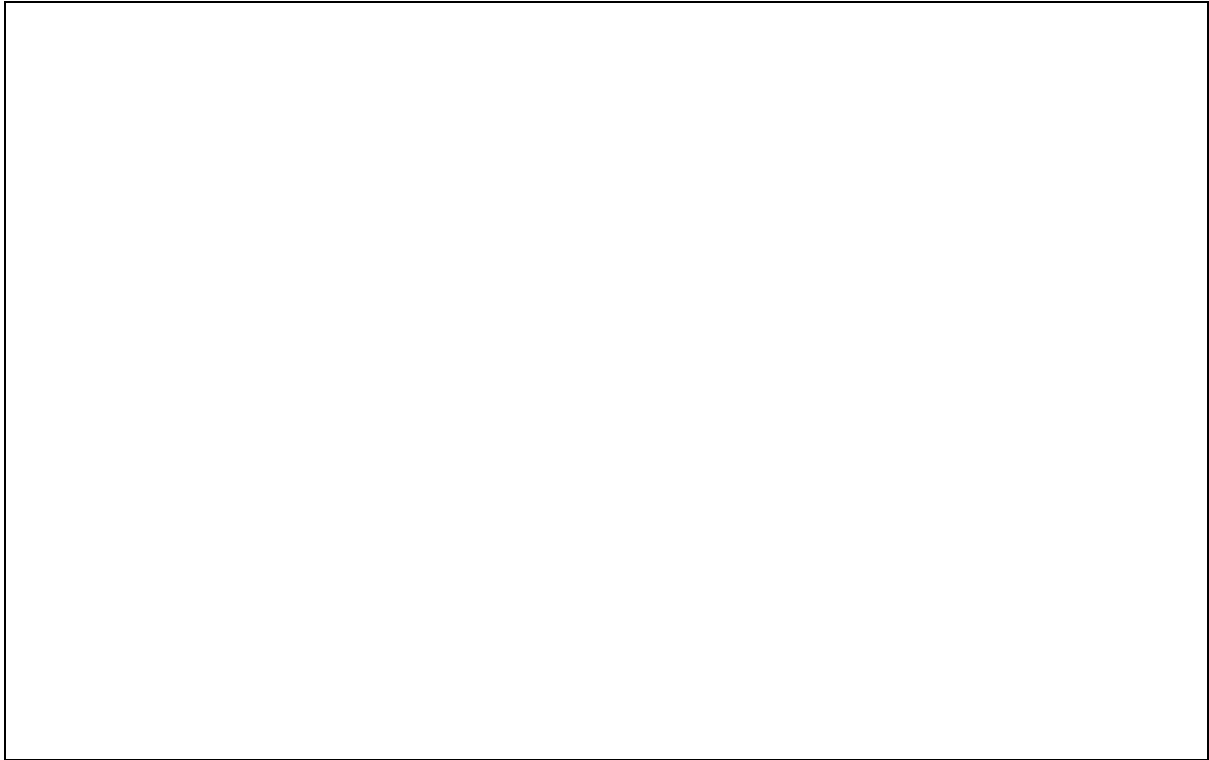
Neither Agree nor Disagree

Somewhat Disagree

Strongly Disagree

If there is information you would like to provide that supports your response to question 5, please include this here.

Question 6: Do you have any challenges to the evidence set out in the SMTF and the new standards for mental health standards and how can these challenges be addressed?



Question 7: We have issued a draft Children’s Rights Impact Assessment (CRIA) for consultation alongside the draft SMTF and the draft standards for mental health services in the prisons. Do you agree with our assessment of impacts on children’s rights set out in the CRIA?

Strongly Agree

Somewhat Agree

Neither Agree nor Disagree

Somewhat Disagree

Strongly Disagree

If there is information you would like to provide that supports your response to question 7, please include this here.

Question 8: We have issued a draft Equalities Impact Assessment for consultation alongside the draft SMTF and the draft standards for mental health services in the prisons. Do you agree with our assessment of impacts on those with protected characteristics?

Strongly Agree

Somewhat Agree

Neither Agree nor Disagree

Somewhat Disagree

Strongly Disagree

If there is information you would like to provide that supports your response to question 8, please include this here.

Question 9: We have issued a draft Welsh Language Impact Assessment for consultation alongside the draft SMTF and the draft standards for mental health services in the prisons. Do you agree with our assessment of impacts on Welsh Language?

Strongly Agree

Somewhat Agree

Neither Agree nor Disagree

Somewhat Disagree

Strongly Disagree

If there is information you would like to provide that supports your response to question 9, please include this here.

Question 10: We would like to know your views on the effects that the draft SMTF and draft standards for mental health services in the prisons would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question 11: Please also explain how you believe the draft SMTF and the draft standards for mental health services in the prisons could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Question 12: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here: