1. Introduction

The strategic document is very useful and we support all the contents and welcome it. We also recognise the compassionate and helpful approach taken routinely by many NIPS officers. There has been a welcome move away from ‘doing the thing right’ to ‘doing the right thing’.

There are, however, a number of issues not fully addressed which we raise in a positive manner in the spirit of partnership as family members with a loved one in prison.

2. The policies, procedures and individual decisions affecting family relationships

Recommendation: All policies, procedures and decisions relevant to family contact should be assessed against the Family Strategy to ensure compliance.

This can be achieved by introducing a pro forma completed by the author of the new policy etc and signed off at a higher level. A separate mechanism for existing policies etc would also need to be worked up.

Historically, in some instances, there has been a disconnect between the high-level Family strategy and how it has been implemented. If this new strategy is simply superimposed on existing policies then it will make no practical difference to family experiences. We set out a few examples below to illustrate the point which should not be taken as an exhaustive list.

- For example, p12 states ‘provide a visiting space that meets the needs …of families…encourage personal contact…’ If this statement is applied to Hydebank Visits then this area fails the standard. Seating is uncomfortable and designed to minimise personal contact. The lack of toilet facilities in the Visits area and lack of baby changing facilities also fail to meet the Strategy standard. There are many other examples of what we might term physical measures that need to be addressed.

- The layout of Visits areas makes the important contact with our small children more difficult as the seating etc is uncomfortable and the areas around each table are not child friendly. This means that children spend most of their time with the People Plus staff who do an outstanding job in looking after and entertaining the children. But the children are there to visit the family member and the physical structures limit this.

- Some policies and changes actively militate against family contact - from not allowing split visits to the rules about access to the Family Room or Caravan at Hydebank.
• When a complaint is made by a family member concerning a visit the issue is investigated by the SO or other officer who made the initial decision which is hardly likely to be independent. Complaints should be escalated to a higher level and also assessed against the Family strategy.

• Of course, there have been recent initiatives that have proved very successful such as the monthly Cabin visits at Hydebank and we applaud these.

3. Involvement of family member in their relative’s rehabilitation. (p9)

Recommendation: Further explanation, at the strategic level, on what this will look like.

We recognise this is important and crucially so for parents with their daughter or son in custody. It is not clear what this will look like.

4. Spousal relationships

Recommendation: That the Family Strategy makes specific mention of maintaining the relationships between spouses and set out an intention to look at ways of enhancing spousal contact.

The Strategy is largely silent on husband/wife issues because the focus is on parent/child relationships. This isn’t a binary choice, if a husband/wife relationship breaks down when one or both is in prison then the impact on children is exacerbated.

In reality the DoJ and NIPS steer away from this area unlike some other jurisdictions. It needs to be addressed if only because it is also at the core of developing the child’s best interests.

5. Setting up a formal consultative family forum.

Recommendation: Setting up a formal consultative family forum as a partner with NIPS and other agencies.

Many of the difficulties family members experience could be resolved by discussion before the procedures are implemented.

Whilst we accept that some of our suggestions would not pass NIPS security concerns there are many others that could be implemented in the short term with minimal costs.

The Forum(s) could be set up along the lines of each prison or at HQ level.

6. Section 75 Compliance
Recommendation: That the Family Strategy sets out the policy in relation to S 75 compliance for prisoners.

We note that the NI Act 1998 is listed in Annex A. Is it the intention to make the Family Strategy S75 compliant (equality issues)? And if so how does this relate to prisoners in terms of the usual equality issues – race, religion, sex etc?