

Unlocking Banking

Impact Report (2014)

Developing effective, efficient & secure access to banking for people in prison before release

Introduction

This report has been written at the end of a landmark 9-year project for Unlock. It is designed to summarise and reflect on the progress that has been made to date, as well as outline some of the key priority areas moving forward. The main focus of the report is on the latter part of the project, which was the national campaign which ran from 2010 to 2014.

Summary of recent progress

In the final year of the project (2013-14);

- 1. **5936 basic bank accounts** were opened for people in prison ready for them to use once they were released¹
- 2. RBS began a 6 month pilot in 9 prisons, expanding into a further 6 prisons
- 3. HSBC expanded from a pilot to cover 15 prisons in total
- 4. Santander completed a review of their pilot, and continued to operate in the original 5 pilot prisons

Overall summary

During the course of the 9-year project;

- 1. Unlock has helped to set up **74 prison/banking programmes**
- 2. **114 prisons** now have links with a high-street bank
- 3. The 'big 5' current account providers (Barclays, Halifax (part of Lloyds Banking Group), HSBC, Santander and RBS) are all actively involved, as well as a significant contribution from Co-operative.
- 4. By the end of 2013, all prisons that wanted and needed a basic bank account opening programme had one

¹ Please note – the majority of the data involves 'accounts opened', but some refer to 'applications'. See later in this report.





Summary of recommendations

This section provides a summary of the recommendations that are made in this report. They are discussed in more detail at the end of the report, alongside an explanation of the reasons behind the recommendations.

1. Single point of contact for prisons and banks

- 1. NOMS should ensure that there is a single point of contact for prisons to contact if they're looking for advice or support in their prison.
- 2. NOMS should ensure that there is a single point of contact for banks to contact if they're looking for advice or support about their work in prison.
- 3. To perform these roles appropriately, we recommend that NOMS dedicates 0.5 FTE staff to overseeing this work at a national level. This is considerably less than the amount of resources Unlock has dedicated to this over the years, and reflects the stage at which this work is now at. A concern we have is that it is unclear at this point whether this level of resource will be achieved.

2. 'Zero-account' prisons / 'Low-volume' prisons / Meeting needs

- 1. Work needs to be done by NOMS to understand why those prisons have not opened any accounts (particularly those that are soon-to-be 'resettlement prisons') and what works need to be done to improve this, as it would suggest that people are being released from those prisons with the need.
- 2. NOMS should establish a standard framework which allows prisons to assess 'need' amongst people in prison, and put in place a system that allows for this to be collected centrally so that 'need' can be matched with the number of accounts actually opened

3. Regular reviews

NOMS should ensure that regular reviews be carried out assessing levels of account opening across the prison estate and across the banks. This review process should capture which banks are covering which prisons, the processes in place, the contacts at each bank, the contacts at each prison, the number of accounts opened, and any issues that are outstanding.

4. Resources in prisons

NOMS should ensure that prisons are sufficiently resourced, and appropriately targeted, to ensure that they're able to help anybody who wants and needs a basic bank account before they are released by supporting them to apply for a bank account with the nominated bank in their prison. Priority should be placed on those prisons designated as 'resettlement prisons', although recognising that any prison that releases individuals directly into the community will need to have access to a system like this.





5. Share of prisons by the banks

NOMS and the BBA should work with those banks having a disproportionately large number of prisons than is sustainable for them (e.g. Co-operative), and work with them and the other major current account providers to re-allocate those prisons to banks that, given their size, should take on further prisons (e.g. Santander, RBS; and those yet to be formally involved – i.e. Yorkshire Bank and Nationwide Building Society). This should be done in an open and transparent way, acknowledging that this is not a 'competitive' area, but rather an issue that the banking industry has collectively committed to support.

6. Local arrangements breaking down

Where a local arrangement breaks-down, NOMS should provide support to the prison to make contact with that specific bank nationally, to include the prison within their national framework.

7. Bank processes – Simplification and standardisation

NOMS and the BBA should consider convening the banks to look at what levels of simplification and standardisation could be achieved across the banks.

8. High return-rates

Prisons should ensure that they are 'checking' applications before they are submitted to the bank, to ensure that they are completed properly and that the appropriate paperwork is enclosed.

9. Pre-release banking in addition to savings provision

All prisons that release people directly into the community should have a system in place which enables people to open a basic bank account before they are released. Alongside this, prisons that have people with a long time left until release should have a system in place which enables people to set up a suitable savings product.

10. Broader 'managing money in prison' issues

NOMS should continue to improve the policies and procedures that are in place that govern the way that people in prison can manage an external bank account, to ensure that there is greater flexibility and ultimately the ability for individuals to prepare effectively for their release.

Future contact

Moving forward, support to both prisons and banks will be provided by NOMS. The provisional lead at NOMS is Rachael Reynolds. Email rachael.reynolds@noms.gsi.gov.uk.

Questions regarding this report can be directed to Christopher Stacey, Director (Services) at Unlock. Email christopher.stacey@unlock.org.uk.





Identified need

Providing access to banking for people in prison before release is one of the foundations of successful resettlement and provides a positive contribution towards reducing re-offending. For the majority of people in prison, the aspiration of opening a basic bank account before release was, before this project began in 2005, unachievable. In many cases, prisons were unable to engage with local branches of banks, leading to frustration and wasted resources on both sides.

The broader case for having a bank account is compelling. There are clear links between financial exclusion, social exclusion, poverty and crime. Cabinet Office research found that when people go to prison; a third lose their homes, two-thirds lose their jobs, and one fifth have increased financial problems. Providing access to banking for prisoners contributes to crime reduction by reducing *re-offending* (costing tax-payers around £13 billion per year) because it is a foundation stone for successful resettlement and reintegration.

Opening even a basic bank account provides access to employment opportunities, as well as to government benefits and charitable grants. Bank accounts make it easier to secure stable accommodation and provide a structure which can facilitate responsible management of personal finance. In addition to creating a barrier to employment and housing, being 'unbanked' prevents people from taking up other mainstream financial products and services. People who are 'financially excluded' either use non-mainstream providers which have higher costs or simply remain unable to access the services most people take for granted. Prisoners who have opened bank accounts also report positive changes in attitudes, such as feeling more 'normal' and 'included in society'. Opening accounts prior to release supports, and benefits from, a wide range of work by prisons, probation, charities and other organisations dedicated to the successful resettlement and reintegration of former prisoners.

Figures that look at the number of people in prison without a bank account varies considerably:

- 1. 40% of people in prison surveyed by the Legal Service Research Centre reported having no current account or other financial products, compared to 5% of people interviewed in the community.
- 2. An evaluation by Liverpool John Moores University found that, prior to the banking project, 69% of prisoners at one prison had no bank account.
- 3. In Unlock's own research report, *Time is Money,* published in 2010, 30% of those surveyed in prison said they did not have a bank account.

After initially running a pilot project in a small number of prisons, it was clear that alongside developing local initiatives, a strategic approach was needed in order to sustain and expand the excellent work being achieved through prison-bank partnerships. Both prisons and banks needed to be supported in their efforts to increase provision to people in prison.





Original aim of the project

"An increased number of prisoners are enabled to open bank accounts prior to release due to prisons being better enabled to deliver account opening services."

Objectives

- Increase the extent to which banks offer bank accounts to serving prisoners
- Increase the number of prisons offering support to prisoners wishing to open a bank account
- Establish links between prisons and banks wishing to offer a bank account support service

Ultimate aim

As the project developed into a national campaign in 2010, the aim of the project shifted to reflect the success to date.

"Every prison that wants and needs a bank account opening service has one"

Activities

Over the course of the project, the activities developed to reflect the progress that had been made.

The project can be broadly split into three sections. These are explained later in this report.

- Original pilot project
- Project development
- National campaign





Key phases of the project

The Pilot Project (2005-2006)

Unlocking Banking was developed by Unlock in 2005 to provide access to basic bank accounts for prisoners who are due to be released, as well as increasing their practical financial capability and developing greater awareness of financial issues. We had received a significant number of calls from former prisoners who were unable to take up offers of employment due to being unable to open a bank account. A commitment within the NOMS action plan (2004) to pilot access to bank accounts for people in prison stemmed from the development of a partnership between Unlock and Halifax bank (now part of the Lloyds Banking Group).

In August 2005, we began a ground-breaking 12 month pilot project to provide access to bank accounts in partnership with Halifax and HM Prison Service. The project was established at HMP Coldingley, a category C training prison for men in Surrey, and HMP Cookham Wood, a [then] female prison in Kent.

Many issues had to be overcome, including proof of identity, offence histories, card and PIN security, access to accounts and a lack of basic personal finance skills. In particular, since most people in prison did not have access to formal identification, the pilot developed a bespoke ID document that allowed governors to verify a person's identity for the bank based on court and Prison Service records. Over time, a process was developed that integrated support in completing applications, a bespoke identification document and tailored basic financial capability training, refined by detailed feedback from all participants.

From 135 applications, the pilot project successfully opened 133 basic bank accounts, all for serving prisoners without any mainstream ID. The project had quickly identified the need for financial capability training tailored towards first time account holders with 98% of participants then rating the training as excellent or good. Halifax tracked usage of the accounts after release and found that participants in the project were statistically better than average basic bank account customers, with low rates of closure, high rates of activity and no charges being levied.

A post project review was carried out by the National Offender Management Service (NOMS). The evaluation led to a commitment by NOMS to "develop a model for wider roll out by 2006/07" within their 2005 delivery plan. Recognition of the project's success came in the HM Treasury Report Promoting Financial Inclusion, and the British Bankers' Association (BBA) and APACS joint publication Financial Inclusion – Access to advice, banking and credit.

The pilot prompted many people from across the Prison Service to speak out about the lack of training and guidance in this area. As a result, a side-project "Unlocking Financial Capability" was born with a simple objective, to build the capacity of prisons and charities to deliver basic banking training to their clients.

However, with few exceptions, prisoners and prison staff continued to be frustrated in their own attempts to build local relationships with banks. In 2006, the NOMS Reducing Re-offending





Action Plan included the roll out of the banking pilot, but with no resourcing or further action, no roll-out occurred.

Separately, private prison HMP Forest Bank formed a partnership with Co-operative Bank in 2006, delivering a pilot project providing access to basic accounts. Only 39% of the 107 who opened a bank account reoffended. The national reoffending rate of people serving sentences of less than 12 months was 59.9%. The Co-operative Bank's openness to applications spread quickly into many prisons. The Bank eventually came to cover 29 prisons. Unlock continued to work with Halifax, developing prison-run services in three prisons, and later with Barclays and Foundation Training Company to establish projects in a further three prisons.

Project Development (2006-2008)

Unlock continued to invest in developing pre-release banking, securing the continued support of Halifax, as well as developing a new partnership with Barclays in 2007. Using its partnerships, Unlock began to set-up pre-release banking projects, establishing sustainable relationships between banks, prisons and service delivery organisations.

Due to the temporary closure of HMP Cookham Wood, our Halifax project moved to HMP Wormwood Scrubs and later expanded into HMP Camp Hill, totalling three prisons.

The Barclays project was piloted in three prisons in the East of England (HMPs Blundeston, Norwich and Littlehey), delivering a service from 2008. This was delivered by the Foundation Training Company (FTC) under a contract with NOMS in the East of England to provide holistic resettlement services within the region's prisons.

By this point, Unlock had begun to recognise the need for broader work. We hosted joint roundtable with the British Bankers Association in the House of Lords, which was followed by a meeting between the banks and the Justice Minister.

In 2008, Unlock formed a partnership with the British Bankers Association (BBA), jointly hosting two roundtable events attended by banks, charities and NOMS. NOMS re-engaged with access to banking as a policy issue, indicating their desire for a rapid increase in the number of prison/bank partnerships but recognising that the resources may not be available in all prisons. NOMS committed to a strategic approach to tackle the barriers.

In December 2009, earlier events led the National Offender Management Service (NOMS) and the BBA to agree a standardised ID form for prisoners, based on the one used by Unlock and Barclays. NOMS published a revised Prison Service Instruction (PSI 35/2009) which instructed governors to support access to banking by using the ID solution developed by the pilot. However, as stated in the PSI, "The completion of the form does not mean that a bank will automatically accept it as ID for the purpose of opening an account." Local bank branches remained unaware of the form, causing significant frustration for people in prison, prison staff and branches.





National Campaign (2010 - 2014)

The focus of the national campaign was to:

- 1. Promote the new ID document contained in PSI 35/2009 to prisons and banks
- 2. Develop and provide practical guidance to prisons on running a banking project efficiently, effectively and securely
- 3. Seek agreements from the major banks that they will work with prisons to open accounts for serving prisoners in order to support resettlement
- 4. Develop a strategic framework for bank/prison partnerships

In 2010, we began working towards a national agreement and protocol between prisons and the banking industry as a whole. The campaign's efforts were focused on three consecutive elements:

- 1. To achieve the political support necessary to encourage other banks to engage
- 2. Once engaged, to support banks in developing in-house processes capable of being 'offered' to prisons
- 3. Using these processes, to support prisons and banks in working together

At the same time, a joint Unlock and Ministry of Justice initiative agreed three objectives:

- 1. Increase the extent to which banks offer bank accounts to serving prisoners
- 2. Increase the number of prisons which offer support to prisoners wishing to open a bank account
- 3. Establish links between prisons and banks wishing to offer a bank account support service.

Unlock mapped existing provision, identifying that 53 prisons had been able to develop relationships with banks but that many others had found it impossible to do so. Guidance was published for prisons on how to deliver access to banking, based on best-practice. Dialogue was established with the major banks with a view to the development of a co-ordinated national approach to prisons. As a result, Barclays committed to covering an entire NOMS region, consisting of a total of 14 prisons.

At a bank-only roundtable discussion at the BBA in 2010, we proposed a model for developing partnerships, due to the difficulties faced by prisoners and prison staff in engaging with banks at a local level. Each bank would agree to accept applications for basic accounts from a number of prisons. Larger banks would take on more prisons. Processing of applications would take place centrally within each bank, rather than at branch level. The ultimate objective was to reach a point where every prison that wants and needs a bank account opening service has one.

In 2011, a joint-letter was sent from Crispin Blunt MP (Secretary of State, Ministry of Justice) and Mark Hoban MP (Secretary of State, HM Treasury) to all banks encouraging them to increase the work that they're doing in opening bank accounts for people before they are released from prison. This was followed by a meeting held at the BBA with all major banks to discuss responses to the Ministerial letter and to explore ways forward.





Shortly after this, Halifax agreed to expand their work in prisons so that they were covering the number of prisons equivalent to their market share of current account customers, which saw a dramatic increase from 3 prisons to approximately 30 prisons. This received significant media coverage at the time (including an article in the Mail on Sunday), because as part of this they committed to cover all women's prisons that were needing an arrangement of this sort.

However, there remained three banks that were yet to engage on the agenda – HSBC, RBS and Santander.

A further joint Minister letter was sent in March 2012, and this had almost instant results. The following month, HSBC begin a 6 month pilot in 3 prisons; HMP High Down, HMP Lewes and HMP Wandsworth. This was quickly followed by Santander, who in September 2012 began a 6 month pilot in 5 prisons: HMP Brixton, HMP Elmley (part of Sheppey Group), HMP Isis, HMP Pentonville and HMP Swaleside (part of Sheppey Group).

The pilots of HSBC and Santander, alongside the significant expansion of Halifax, led to an All Party Parliamentary Group focusing on Access to Banking in November 2012, where the focus was on recognising the progress that had been made. The only major bank left to get involved was RBS.

In December 2012, a meeting was held between Jeremy Wright MP (Secretary of State, Ministry of Justice) and Directors of RBS bank. At this meeting, the bank agreed to begin a 12 month pilot in 5 prisons, to begin in March 2013.

2013 saw further developments in bank activity, including an expansion from HSBC, expanding the programme to cover 15 prisons. This was later followed by RBS, which expanded in November 2013 to also cover 15 prisons. The result is that all prisons that want and need a bank account opening service had one.

Links with credit unions in prisons

In addition to work by banks, there have been local developments between prisons and credit unions. An example of a successful partnership is Leeds City Credit Union, which has been working with local prisons HMP Leeds and HMP Wealstun since 2007. This collaboration has led to the opening of 600 savings accounts. At Leeds prison, the scheme offers money management services to people in prison and staff. More information about the role of credit unions is available in a report that Unlock published in 2013, *Unlocking Credit Unions*.





How we've worked with banks and prisons

With each of the banks², we worked with them through a number of key stages:

Commitment stage

We secured commitment from the bank to work with prisons. This was secured in different ways, but invariably resulted in high-level discussions with senior representatives of the bank, working in partnership with Government and others. Each time a bank has committed to working with more prisons, we've gone out to prisons to put forward the "offer", to establish prisons who wish to work with the particular bank. Priority has been focused on those prisons that are most likely to release people directly into the community, As a result, High Security prisons, Immigration Removal Centres and Foreign National prisons have not been targeted by this work.

Operational process development stage

Once a commitment was established, we worked with the bank to develop a process that would work for them. This involved understanding various aspects of their internal processes, and working with representatives for departments such as Anti-Money Laundering, Account Opening teams. Risk and others.

Pilot stage

Once a process had been agreed and signed off, we identified a number of potential prisons to partner with them, and arranged for the prisons and the bank to meet to discuss the operational process. In some cases, this involved full-day training sessions. In other cases, it involved a teleconference with the various prisons. This enabled the prison to become familiar with the process that the bank has established. There was then a period of 'piloting', which allowed operational issues to be ironed out.

Review stage

After the pilot period, we worked with the bank to review the pilot process, and make any amendments necessary, based on feedback from both the prison and the bank, account activity, and feedback received from individual customers.

Delivery stage

Following the review stage, we worked with the bank to ensure that this process was embedded into a 'business as usual' process. Once the pilot has been reviewed by both the prison and the bank, we have supported a 'business as usual' approach, supporting prisons to establish this operation within their day-to-day work.

² Co-operative Bank committed and piloted their process in 2006. We provided support to them in reviewing their processes from 2010 onwards as part of our national work





Principles of a typical banking programme

- Each bank has a standard process in place for the opening of bank accounts for people in prison. In many cases, these are quite detailed, and are usually shared with the individual prisons that they cover. These contain details such as;
 - a. who is eligible to apply;
 - b. how an individual can apply;
 - c. filling out the application form;
 - d. where applications should be sent to;
 - e. how applications are processed;
 - f. how the account-opening process works; and
 - g. what to do on release.
- Banks do not go into prisons to open accounts. On occasions, prisons and banks might have separate arrangements in place, but these should be running separately to the process of opening accounts
- All of the processes use the standard Personal Identification Document issued by NOMS.
 This is used as the only form of identification needed to open an account
- The face-to-face support provided in prisons is delivered by Prison Service, charity staff and other agencies that provide various support services in prisons and through the gate.
- Some of the banks have some 'information' that they require the prison to deliver to potential applicants. This is often because the standard literature that comes with the application pack doesn't explain differences given they are in prison, such as that they won't be able to access telephone and internet banking.





Processes of each bank

Although the processes of each bank are similar in many respects, some of the key elements to each of the processes vary slightly. Some of these subtle differences are listed below.

Barclays

- 1. A maximum of 25 applications per prison, per month
- 2. No less than four weeks left until release
- 3. Cards & PINs are sent to the prison and held on the individuals behalf

Co-operative

- 1. No limit on the number of applications per prison
- 2. Expected release date within the next 12 months
- 3. Cards & PINs are sent to the prison and held on the individuals behalf

Halifax

- 1. Technical limit of 10 applications per prison, per month, but operationally the bank is operating under its maximum capacity, so is happy to receive more than this from individual prisons
- 2. No less than six weeks/and no more than 12 months until expected release date
- 3. Cards & PINs are sent to the prison and held on the individuals behalf, but the card must be activated on release by providing a new address after leaving prison

HSBC

- 1. No limit on the number of applications per prison
- 2. Expected release date within the next six months
- 3. Accounts are opened before release. Cards & PIN's are ordered in branch after release

RBS

- 1. No limit on the number of applications per prison
- 2. No limits on the time left until release
- 3. Cards & PINs are sent to the prison and held on the individuals behalf

Santander

- 1. Limit of 20 applications per prison, per month (to be lifted after pilot period)
- 2. No less than four weeks/no more than six months until expected release date
- 3. Cards & PINs are sent to the prison and held on the individuals behalf

Other banks/institutions

- 1. The focus of this work was on the 'big 5' current-account providers
- 2. Engagement with smaller institutions took place between 2010 and 2012, including Nationwide Building Society and Yorkshire Bank, but it was felt that the priority should be on getting the 'Big 6' involved first.



Summary of bank activity

Bank	Barclays	Co-operative	Halifax	HSBC	RBS	Santander
Name of account	Cash Card Account	Cashminder	Easycash	Basic Bank Account	Basic Account	Basic Current Account
Prisons they cover	15	28	34	19	13	5
Number of accounts opened in 2013	690	2791	650	185* (June 2013 to December 2013)	1156 (April 2013 to May 2014)	332
No. of prisons given current account %	15	3	34	16	18	14
Expansion/reduction needed	0	-25	0	-3	+5	+9
Unlock's notes		As a result of a disproportionately large share of prisons, we recommend this is reduced to ensure a fair and sustainable process (see recommendation 5)			To roll-out in Warren Hill in 2014 To cover further prisons as/when required	To cover further prisons as/when required Remove limit per prison at end of pilot (June 2014)

Summary of prisons

List of prisons

			Accounts opened	
Prison	Link (Main)	Link (Additional)	(2013)	Notes
Acklington (HMP Northumberland)	Halifax		0	
Altcourse	Halifax		83	
Ashfield (Changing to Cat C, 2014)	RBS		36	
Askham Grange	HSBC	North Yorkshire Credit Union	n/a	Local arrangement
Aylesbury	Co-operative		13	
Bedford	Barclays		48	
Belmarsh	RBS		207	Applications, Apr 13 - May 14
Birmingham	Co-operative		138	
Blantyre House	Lloyds TSB		n/a	Local arrangement
Blundeston (now closed)	Barclays		51	
Brinsford	Halifax		12	
Bristol	Co-operative	Bristol Credit Union	17	
Brixton	Santander		23	
Bronzefield	Halifax		5	
Buckley Hall	Co-operative		48	
Bullingdon	HSBC		0	
Bure	Barclays		205	
Cardiff	Halifax		42	
Castington (HMP Northumberland)	Halifax		0	
Channings Wood	Co-operative		109	
Chelmsford	Barclays		23	

Coldingley	Halifax		8	
Cookham Wood	RBS		0	
Dartmoor	Co-operative		78	
Deerbolt	Halifax		16	
Doncaster	Barclays		n/a	Local arrangement
Dovegate	Co-operative		68	
Dover	N/A - IRC		n/a	
Downview	Halifax		15	
Drake Hall	RBS		32	Applications, Apr 13 - May 14
Durham	Halifax		0	
East Sutton Park	Lloyds TSB		n/a	Local arrangement
Eastwood Park	Co-operative		3	
Erlestoke	Co-operative		56	
Everthorpe	HSBC	Hull and East Yorkshire Credit Union	0	
Exeter	HSBC		0	
Featherstone	HSBC		0	
Feltham	HSBC		12	Applications, Nov 13 – Dec 13
Ford	Co-operative		166	
Forest Bank	Co-operative		308	
Foston Hall	Halifax		11	
Frankland	N/A - High Security		n/a	
Full Sutton	N/A - High Security		n/a	
Garth	Co-operative		22	
Gartree	N/A - Not needed		n/a	
Glen Parva	HSBC		n/a	Local arrangement
Grendon	N/A - Not needed		n/a	
Guys Marsh	Co-operative		20	
Haslar	N/A - IRC		n/a	
Hatfield	South Yorkshire Credit Union		n/a	Local arrangement

Haverigg	Co-operative		68	
Hewell	Halifax		0	
High Down	HSBC		58	Applications, Jun 13 – Dec 13
Highpoint North	Barclays		50	Split equally between 2 sites
Highpoint South	Barclays		50	
Hindley	Halifax		3	
Hollesley Bay	Co-operative		243	
Holloway	Halifax		0	
Holme House	Co-operative		55	
Hull	Halifax	Hull and East Yorkshire Credit Union	17	
Huntercombe	N/A - FNP		n/a	
Isis	Santander		90	
Isle of Wight (Albany)	Barclays	Co-operative	n/a	Local arrangement
Isle of Wight (Parkhurst)	Barclays		n/a	Local arrangement
Kennet	Halifax	Sefton Credit Union	70	
Kirkham	RBS		213	Applications, Apr 13 - May 14
Kirklevington Grange	HSBC		n/a	Local arrangement
Lancaster Farms	Halifax		15	
Leeds	HSBC	Leeds City Credit Union	4	Applications, Oct 13 – Dec 13
Leicester	HSBC	Clockwise Credit Union	0	
Lewes	HSBC		0	
Leyhill	Bristol Credit Union		n/a	Local arrangement
Lincoln	RBS		215	Applications, Apr 13 - May 14
Lindholme	South Yorkshire Credit Union		n/a	Local arrangement
Littlehey	Barclays		148	
Liverpool	Halifax	Sefton Credit Union	8	
Long Lartin	N/A - High Security		n/a	
Low Newton	Halifax		3	
Lowdham Grange	Halifax		28	

Maidstone	Co-operative		33	
Manchester	Co-operative		27	
Moorland (Closed)	South Yorkshire Credit Union		n/a	Local arrangement
Morton Hall	N/A - IRC		n/a	
New Hall	Halifax	White Rose Credit Union	0	
North Sea Camp	HSBC		n/a	Local arrangement
Norwich	Barclays		40	
Nottingham	Halifax		0	
Oakwood	HSBC		49	Applications, Jun 13 – Dec 13
Onley	Co-operative		166	
Parc	Co-operative		163	
Pentonville	Santander		70	
Peterborough	Barclays		52	
Portland	Co-operative		187	
Prescoed	RBS		81	Applications, Apr 13 - May 14
Preston	Halifax		47	
Ranby	Co-operative		298	
Risley	RBS		0	
Rochester	HSBC		19	Applications, Aug 13 – Dec 13
Rye Hill	Co-operative		27	
Send	HSBC		7	Applications, Nov 13 – Dec 13
Sheppey Cluster (Elmley)	Santander		96	
Sheppey Cluster (Standford Hill)	Co-operative		103	
Sheppey Cluster (Swaleside)	Santander		53	
Spring Hill	Barclays		n/a	Local arrangement
Stafford	RBS		168	Applications, Apr 13 - May 14
Stocken	Halifax	Clockwise Credit Union	72	
Stoke Heath	Halifax		11	
Styal	RBS		30	Applications, Apr 13 - May 14

Sudbury	RBS		84	Applications, Apr 13 - May 14
Swansea	Halifax	LASA Credit Union	11	
Swinfen Hall	Halifax	Fusion Credit Union	36	
Thameside	HSBC		0	
The Mount	Barclays		74	
The Verne	Co-operative		66	
Thorn Cross	RBS		90	Applications, Apr 13 - May 14
Usk	Halifax		8	
Wakefield	White Rose Credit Union		n/a	Local arrangement
Wandsworth	HSBC		36	Applications, July 13 – Dec 13
Warren Hill	RBS (pending)		n/a	
Wayland	Barclays	Co-operative	165	
Wealstun	Halifax	Leeds City Credit Union	31	
Werrington	RBS		0	
Wetherby	Halifax		0	Started December 2014
Whatton	Co-operative		77	
Whitemoor	N/A - High Security		n/a	
Winchester	Co-operative		115	
Wolds	Halifax	Hull and East Yorkshire Credit Union	14	
Woodhill	HSBC		0	
Wormwood Scrubs	Halifax		0	
Wymott	Co-operative		117	

Notes about bank activity

- 'No. of prisons given current account %' is based on the market share of each bank in the current account market, as reported by the OFT in 2010.
- * HSBC's and RBS's figures are based on the number of applications submitted (due to data collection systems in place)
- In addition to the banks listed;
 - o Yorkshire Bank is reported to have a 2% market share, which equates to 2 prisons
 - Nationwide Building Society is reported to have a 7% market share, which equates to 8 prisons
 - o 'Others' are reported to have 3% market share, which equates to 4 prisons
- Contacts at each of the banks are available through NOMS (see Annex)

Notes about the list of prisons

- This is accurate as of April 2014. It doesn't necessarily correspond with the current list of prisons published by the Ministry of Justice. Due to the shifting landscape of how prisons are structured, this project has sought to maintain differences between certain establishments, even where they might be linked, or counted as one prison, to better reflect the banking arrangement in that prison.
- Where possible, the number of accounts represents the number of accounts opened, provided to Unlock by each of the banks. Where this isn't available, we have included alternative figures (such as the number of applications).
- Contacts at each of the prisons are available through NOMS.



Top 10 prisons

Based on the figures that have been reported by the banks individually, we have compiled a list of the ten prisons that have opened the most accounts in 2013:

1.	Forest Bank	308
2.	Ranby	298
3.	Hollesley Bay	243
4.	Lincoln	215
5.	Kirkham	213
6.	Belmarsh	207
7.	Bure	205
8.	Portland	187
9.	Stafford	168
10.	Ford	166

'Zero-prisons' with established links with banks

The prisons listed below have had links with banks established as part of this project but didn't open any accounts in 2013:

- Bullingdon
- Castington (HMP Northumberland)
- Cookham Wood
- Durham
- Everthorpe
- Exeter
- Featherstone
- Hewell
- Holloway

- Leicester
- Lewes
- New Hall
- Nottingham
- Risley
- Thameside
- Werrington
- Wetherby
- Woodhill
- Wormwood Scrubs

The reasons for this varies across prisons, and is discussed in more depth later in the 'Remaining challenges/recommended next steps' section.





Why it's worked

It is important for Unlock to document why we think the project has worked, and how it should continue to do so.

The success of the project can be put down to a variety of reasons. However, they can generally be seen from four perspectives (and some below to more than one). Some of these reasons are outlined below.

Why it's worked - Bank perspective

Leadership on financial inclusion in the banking industry

The strategic nature of the project provided an opportunity for the banks to be seen as leading in this space. The BBA promoted its partnership work with Unlock and NOMS as powerful evidence of the industry's commitment to tackle financial exclusion. The role of the BBA was important in keeping this issue on the agenda for the industry moving forward.

Demonstrated support of a key government initiative

HM Treasury, the DWP and the Ministry of Justice have all indicated support for access to banking for prisoners. Crime reduction through reduced re-offending is a key objective for government due to its electoral importance and the need to reduce costs. The banking industry has been able to show its support of this process.

Large-scale impact

Although in applicant numbers the figures dwarf the 'normal' customer base of the banks, the steps taken by the banks have contributed to a national impact both strategically and in terms of delivery.

Relatively low cost / Sustainability

The model of delivery means that the cost to the banks have been kept to a minimum. 'Remote' account opening has ensured that banks have been able to continue the arrangements they've put in place, and allow them to become sustainable.

Focus on account opening

A basic bank account is only one part of a bigger picture. For example, the provision of financial capability training is important. However, this project has focused solely on opening a basic bank account, to ensure that the processes set up are sustainable. Too many other initiatives have fallen down due to changes in local bank staff or project priorities.

National tailored arrangements

Each bank has developed its own bespoke process that applies across the prisons that the bank works with. This ensures that the bank is able to sign-off on a number of key parts in the process.



While they all operate along broadly similar lines, they vary in different ways. This responds to the individual areas of focus for each bank. It also ensures that arrangements are not vulnerable to 'being pulled' by Head Office – this is a practice that local initiatives have experienced.

Positive media coverage

Coverage of efforts to improve access to banking in prisons has received universally positive coverage in the national media, such as the Mail on Sunday, The Guardian and BBC Radio 4.

Single point of contact

Unlock provided a single point of contact to each of the banks. This helped at all stages in the process – from initial 'business case' development, to securing sign-off internally within the bank, to developing operational processes and launching processes in partnership with identified prisons. There was also significant support given on a day-to-day basis, responding to questions raised as part of the operational process.

Business-as-usual aim

Our focus was to support banks to do their core work – i.e. open up bank accounts. Throughout the project, we resisted suggestions from all sides to "do more", such as banks visiting prisons and delivering additional workshops on financial capability. Despite these being worthwhile opportunities, our view was to focus firmly on the opening of bank accounts in a sustainable way – our experience was that "heavy" projects (in a resource sense) were more likely to have an end-date attached to them.

Why it's worked - Prison perspective

Standard prison framework

Unlock and NOMS worked closely to ensure that there were a standard set of operating practices which were in line with prison rules and policies, which each prison was able to sign up to.

Dedicated 'banking leads'

Each prison should have a nominated 'banking lead'. This ensures that the bank is able to maintain a single point of contact at the prison, should any queries arise.

Ownership by the prison

It has been important for the banks to agree their process with the prison, rather than organisations working in those prisons. This ensures that the process can continue in the event of a change in the service-delivery contract operating in a particular prison.

Operational contacts with the bank

Unlike ordinary account opening processes, prison banking leads have been in touch with operational contacts at the bank, which has enabled the process to move much smoother all round.



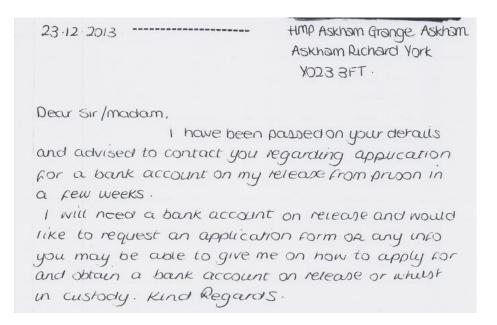
Prison inspections

We worked with HM Chief Inspector of Prisons to ensure that the provision of bank account opening services was looked at as part of their inspection process. This has prompted interest from prisons who have an upcoming inspection, or have been criticised by a recent inspection. This 'external review' process is a useful way of holding prisons to account.

Why it's worked – Individual perspective

It's needed

People who are near to release from prison need a bank account to prepare for life in the community. A typical letter that we receive to our Helpline is included below.



Basic bank accounts

Lots of people in prison haven't had a bank account before, or if they did, they haven't used it for some time. In some cases, the reason they end up in prison was because of financial difficulties which led them into the situation that they're now in. So the focus on a basic bank account (as opposed to a current account) made the likelihood of application success much greater.

Set up before release

Critically for this project, the accounts are designed so that applications are processed while the individual is still in prison. If successful, the account is up and opened before somebody is released. This allows, in most cases, Cards & PIN's to be issued by the bank and held by the prison on behalf of the individual. It also means that payments can be made before release.





Why it's worked - Unlock perspective

Government support

The Government-backing to this project has been overwhelming. In particular, the support from Ministers at the Ministry of Justice and HM Treasury, and the willingness of civil servants at an operational level to keep this issue on the agenda, has been a critical reason behind the amount of progress that has been made. The fact that the Government has a stake in a number of high-street banks has also helped to encourage the banks to do more.

Banking industry support

Although it's perhaps a fair reflection to state that some banks were reluctant to engage in this issue at the start, the level of support from across the industry has been staggering. In particular, the British Bankers Association has led the way in providing a space in which the banking industry can share experiences and develop the project in an open and constructive way. Keeping the issue 'on the agenda' has also been important.

Bi-lateral support / Single point of contact

A consistent feature throughout the project has been the role of Unlock. We have maintained a central point of contact for all concerned. Undoubtedly, this role has ensured that commitments on all sides are met, and that any issues that arise can be resolved. This role has driven through strategic decision-making at banks, right down to individual application issues. The flexible nature of this support has been particularly important in the early stages of a process.

Focus on basic bank accounts

The project has, since day one, focused on opening basic accounts. This has attempted to fill a gap in provision. Since the beginning of the project, there have been various developments with other types of accounts, such as credit union current accounts, pre-paid cards, current accounts feecharging accounts and savings accounts. However, while some of these are complimentary to basic bank account provision, they shouldn't be seen as an alternative to accessing mainstream banking services with no monthly fee.

Standard form of identification

Establishing a standard form of identification has been a cornerstone to this work. The ability for prisons to provide a document that all of the banks will accept has overcome many of the original hurdles that were in place.





Remaining challenges / recommended next steps

Although the primary objective of the project has been met, there remain some challenges ahead to ensure that the progress that has been made to date is maintained.

As we hand over responsibility to NOMS, we've set out some of the key areas that we believe need looking at moving forward.

1. Single point of contact for prisons and banks

Challenge

For the last 9 years, Unlock has been the single point of contact for both prisons and banks. This will no longer be the case, as Unlock will no longer be funded to provide this support. In recent times, our efforts have been to ensure that relationships between prisons and banks are sustainable and require very little 'middle-man' support. However, there remains a need for support to be provided to both prisons and banks.

Recommended next steps

- 1. NOMS should ensure that there is a single point of contact for prisons to contact if they're looking for advice or support in their prison.
- 2. NOMS should ensure that there is a single point of contact for banks to contact if they're looking for advice or support about their work in prison.
- 3. To perform these roles appropriately, we recommend that NOMS dedicates 0.5 FTE staff to overseeing this work at a national level. This is considerably less than the amount of resources Unlock has dedicated to this over the years, and reflects the stage at which this work is now at. A concern we have is that it is unclear at this point whether this level of resource will be achieved.

The contact details for NOMS are in the Annex at the end of this report.

2. 'Zero-account' prisons / 'Low-volume' prisons / Meeting needs

Challenge

There are some prisons which, despite having established a direct link with a bank, during the whole of 2013 haven't had anybody open a bank account with their nominated bank. This is despite some of these prisons being 'new' prisons that confirmed that this was something that was desperately needed. Although prisons vary hugely, the low figures in some prisons cannot be explained by this alone. In many cases, the issue of resources has been raised (see below for more on this).





Recommended next steps

- 1. Work needs to be done by NOMS to understand why those prisons have not opened any accounts (particularly those that are soon-to-be 'resettlement prisons') and what works need to be done to improve this, as it would suggest that people are being released from those prisons with the need.
- 2. NOMS should establish a standard framework which allows prisons to asses 'need' amongst people in prison, and put in place a system that allows for this to be collected centrally so that 'need' can be matched with the number of accounts actually opened

3. Regular reviews

Challenge

Linked to the need for a single point of contact is the need for this work to be regularly reviewed, assessing levels of account opening across prisons, and undergoing review mechanisms that ensure that the systems in place are meeting the needs of people who are being released.

Recommended next steps

NOMS should ensure that regular reviews be carried out assessing levels of account opening across the prison estate and across the banks. This review process should capture which banks are covering which prisons, the processes in place, the contacts at each bank, the contacts at each prison, the number of accounts opened, and any issues that are outstanding.

4. Resources in prisons

Challenge

There are an increasing number of reports that prisons simply do not have the resources needed to support these types of arrangements. Although many prisons continue to prioritise this work, a considerable number of prisons have had significant changes in staff responsibilities, and this work has suffered. Unlock wrote to Jeremy Wright, the Minister for Prisons in late 2013 raising concerns about the forthcoming changes to prisons and the need to ensure that prisons are sufficiently supported to allow them to continue this important resettlement work. There remains a genuine question as to whose responsibility in prisons this type of work is.

Recommended next step

NOMS should ensure that prisons are sufficiently resourced, and appropriately targeted, to ensure that they're able to help anybody who wants and needs a basic bank account before they are released by supporting them to apply for a bank account with the nominated bank in their prison. Priority should be placed on those prisons designated as 'resettlement prisons', although recognising that any prison that releases individuals directly into the community will need to have access to a system like this.



5. Share of prisons by the banks

Challenge

The focus of our work has been to ensure that every prison that wants and needs a system in place is able to do so. This has been done by systematically working with each bank individually, supporting them to take on prisons that wanted it, working towards a number of prisons that broadly matches their size as a bank. By the end of 2013, all prisons were covered. However, the aim has always been to have a sustainable system by creating a fair and equitable process where banks take on their fair share.

Due to the way that this work has evolved, in the latter stages, there were only a small number of 'new' prisons left, which meant that banks such as Santander and RBS, and to some extent the remaining institutions (such as Yorkshire Bank and Nationwide Building Society) didn't have any prisons to cover, because other banks have a disproportionately larger number of prisons compared with their size. The most prominent example of this is the Co-operative bank. They currently cover 28 prisons, when their size would only equate to approximately three prisons. In 2013, they 47% of the total accounts opened in prisons.

Recommended next step

NOMS and the BBA should work with those banks having a disproportionately large number of prisons than is sustainable for them (e.g. Co-operative), and work with them and the other major current account providers to re-allocate those prisons to banks that, given their size, should take on further prisons (e.g. Santander, RBS; and those yet to be formally involved – i.e. Yorkshire Bank and Nationwide Building Society). This should be done in an open and transparent way, acknowledging that this is not a 'competitive' area, but rather an issue that the banking industry has collectively committed to support.

6. Local arrangements breaking down

Challenge

Despite our best efforts to encourage all prisons to establish national, central arrangements with banks, a small number have maintained local arrangements with banks, which in many cases work well. Unfortunately, in some cases, for various reasons, there comes a time when they run into difficulties (see example below).

"Back in 2012 you contacted us to ask whether we needed help setting up bank accounts for our inmates. At that time there had been an on-going relationship with [Bank] for many years, but unfortunately back in March 2014 they advised us that they no longer have the levels of staff at the local branch to be able to offer this service for the prisoners here. I've contacted other banks locally, but none have been able to help. Do you know of any other banks that you are aware of currently working with other establishments that I might be able to contact to ask if they would be prepared to link with us to offer the prisoners here the ability to open a basic bank account. This is beginning to cause us problems now."



Recommended next steps

Where a local arrangement breaks-down, NOMS should provide support to the prison to make contact with that specific bank nationally, to include the prison within their national framework.

7. Bank processes – Simplification and standardisation

Challenge

Each of the banks have developed their processes in isolation to one another, albeit having had discussions with others on how they've gone about it, and we have tried to work towards simple and standardised processes wherever possible, however the result has often been some nuanced systems, reflective of the fact that the bank is new to this work.

Although the processes of each bank undoubtedly work in practice, the result is that some bank processes seem more complicated than others, and some may seem to be more accessible than others. Factors that vary include:

- 1. The number of applications that can be made by a prison per month
- 2. The length of time needed until release
- 3. The fact that a release date is required (ruling out lifers and IPP's)

Often, prisons will compare the processes that other prisons use, and for various reasons, may prefer to use the processes of another bank. This kind of 'swapping' is not something that would be helpful to the banking industry, so an alternative could be to try and simplify many of the processes involved, and look at what ways a 'standard' approach can be taken.

Recommended next step

NOMS and the BBA should consider convening the banks to look at what levels of simplification and standardisation could be achieved across the banks.

8. High return-rates

Challenge

Although the data surrounding this issue hasn't been recorded in detail in this report, it is apparent from the data received from the banks that, in some cases, the 'return-rate' is quite high. By this, we mean the number of applications that have to be returned to the prison because they have not been completed correctly. For example, with Halifax, there were 650 accounts accepted, but a further 273 were returned. The quality of support that is given to people when they're applying for a bank account is a key way of reducing this problem.





Recommended next step

Prisons should ensure that they are 'checking' applications before they are submitted to the bank, to ensure that they are completed properly and that the appropriate paperwork is enclosed.

9. Pre-release banking in addition to savings provision

Challenge

As the work has developed, there has been tension in some prisons as to whether to run a basic bank account programme, or whether to run a savings programme with a credit union. Access to a basic bank account is a critical part of the resettlement process – basic bank accounts enable people to receive wages and benefits on release – there is no monthly fee for the account, and accounts will come with either a cash card or a debit card. Essentially, they provide individuals with a mainstream transactional account that they can use to manage their daily finances on release. However, basic bank accounts do not pay any interest on balances, and are designed to be used frequently, so they do not make a very good savings product.

There remains a small number of prisons that have insisted on simply maintaining a link with a credit union, where the 'current account' options usually involve a monthly fee.

Recommended next step

All prisons that release people directly into the community should have a system in place which enables people to open a basic bank account before they are released. Alongside this, prisons that have people with a long time left until release should have a system in place which enables people to set up a suitable savings product.

10. Broader 'managing money in prison' issues

Challenge

The focus of this work has been on setting up bank accounts for people when they are near to release. However, as more and more people in prison are set up with bank accounts, there will be an increasing need to look at how prisons do (or don't) allow people to manage their personal financial affairs while in prison. One example is the difficulty that people can have when they try to make transfers from an external bank account into their prison account, and vice-versa. A more recent suggestion was the use of bank accounts as a means of paying the discharge grant.

Recommended next step





NOMS should continue to improve the policies and procedures that are in place that govern the way that people in prison can manage an external bank account, to ensure that there is greater flexibility and ultimately the ability for individuals to prepare effectively for their release.

Feedback - Prison

"Since the pilot was set up in September 2012, we have found that a significant number of individuals have required access to the service. To date we have had 290 people referred (we operate a waiting list so some of these are not yet eligible due to time of release) and have successfully opened 140 accounts

As a prison we have a particular focus on resettlement, and I manage the housing support, debt and money management and family mediation teams.

The bank accounts have been of use to our resettlement goals, as it enables us to ensure that our clients are able to receive benefits, enter into employment and secure accommodation.

Furthermore, for some of our clients it is the first part of a legitimate identity in society. I have had many individuals talk with pride to their fellow prisoners, showing them that they now have a bank account and a cash card. I have also had several clients who have had no ID for years, and no means of getting any. Without access to this scheme, a bank account has been impossible.

The bank have been great to work with. They are very responsive and understanding to the varying needs of our clients.

The scheme is an asset to the prison, my service and the clients alike."

Lauren Sheehy, HMP/YOI Isis





Feedback - Individual

"I was in an open prison a couple of years ago. Having gone into prison with the loss of everything, I had no bank account, no ID, no anything. I was approached by staff one day and told about this wonderful scheme which would allow me to get started again. Very simply, the bank was Barclays and they had the most amazing very straightforward system for getting a bank account open. I would highly praise them, and UNLOCK for organising it, and for the way that is done. The account is opened, you have the bank card and details a couple of weeks later, and they are kept in your private property until you are released from prison. So you are actually ready to go the day you get out.

But to me the biggest things are the personal things. Self-esteem is a big thing and the bank account helped a great deal with that. Can you imagine what it is like not to have a bank account? Just for a moment. Not so much the practicalities but what it says about you. Why haven't you got one? People give you funny looks, or you suspect they do. Getting a bank account in prison made me feel a great deal better about myself; that I belonged, and that reintegration was possible. Prison, for all the wrongs you have done to get you there, is a very lonely place, and that's one of the problems when it comes to reintegrating when you get out. Anything that can be done to improve things there will help people.

Confidentiality is another thing: the way the accounts are set up. When you go to your branch when you get out, the staff don't know you are an ex-offender. There is nothing on the system to say: this man is a former criminal; this account was set up in prison. That's a fantastic feeling: to walk in to a branch as a normal citizen. One of the things that really hit me when I came out of prison, when I got onto the Jubilee line to head home, I was absolutely paranoid, that I had 'prisoner' stamped across my forehead. I kept looking round the carriage thinking 'they know'. And I'm not normally a paranoid person. A lot of people go through that. But when you walk into a bank branch and know they will treat you as a normal customer, and that rubber stamp on your forehead is no longer there, that is a fantastic feeling.

There are too many things, emotionally, that drag people back into prison. I know it sounds strange but I think bank accounts and having them set up for you, can help reduce re-offending. It's one thing out of the way. You've got your benefits when you come out, you get paid when you find employment, it's just one less box you have to tick. I think it's a fantastic scheme and long may it continue, and be rolled out across the estate."

Person with convictions, released from prison





Annex - Frequently asked questions

Can prisons have more than one banking relationship?

Yes. Our focus has been to make sure that every prison that wants and needs a banking relationship has one in place. There is no reason why a prison cannot have more than one. However, our experience is that if the prison has an existing arrangement, there needs to be a clear reason why a further process is required.

What if someone wants help to open an account with a different bank

There is technically no reason why somebody cannot try to apply with another bank. However, many of the processes are quite strict in receiving only applications from the prisons that they cover. If this is the case, the advice should be to set up an account with the linked bank to that prison, and then switch the account once they are released.

The person who ran our banking programme has left – what should we do?

Hopefully, the prison banking lead has handed the details over to somebody else in the prison. Banks are particularly keen to make sure that prisons take responsibility for the arrangements in their prison, which means dealing with issues like staff changeover in-house, instead of the bank having to go through the whole process again with the new member of staff. Sadly, this doesn't always happen. In any event, you should get in touch with the appropriate contact at the bank to update them with the changeover of personnel.

Our local banking arrangement no longer exists – who can we use?

We would recommend that you make contact with the bank that you previously used, but at a national level, through NOMS. This will enable you to request that you continue to work with that bank, but use their 'standard' operating process for prisons.

Can the ID document be used on release?

Unfortunately not, because it can only be used to confirm a current address. This is why it's often better to get a bank account set up before release, as it can sometimes overcome problems relating to identification.

We don't have the resources in our prison to do this – how do other prisons manage it?

Prisons respond to the delivery of this programme in different ways. Some prisons manage this process within 'in-house' resettlement teams. Others add this provision onto existing or new resettlement contracts. There's no 'one size fits all' approach, although we have raised the issue of resources with NOMS, as part of the Transforming Rehabilitation reforms, and we anticipate Community Rehabilitation Companies to be increasingly involved in supporting this process moving forward.





Annex – Resources and contacts

Resources

- Unlocking Banking Guidance Guidance for prisons on running effective, efficient and secure access to banking services (December 2010)
- Time is Money (2010)
- Making Bank Accounts Accessible to Offenders Post Project Review Report (with NOMS, June 2007)
- Banking on a Fresh Start (Liverpool John Moores University, August 2008)
- Still Banking on a Fresh Start (Liverpool John Moores University, November 2009)
- Unlocking Credit Unions (2013)

All of these resources are available to download from the 'Banking' policy section of www.unlock.org.uk.

Future contact

Moving forward, support to both prisons and banks will be provided by NOMS.

The provisional lead at NOMS (subject to change) is:

Rachael Reynolds
Reintegration Services Manager
Offender Services Co-Commissioning Group
National Offender Management Service
Telephone: 07799 621215

Email: rachael.reynolds@noms.gsi.gov.uk

Questions regarding this report can be directed to:

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About Unlock

We are an independent award-winning charity, providing trusted information, advice and advocacy services for people with criminal convictions. Our staff and volunteers combine professional training with personal experience to help others overcome the long-term problems that having a conviction can cause. Our expertise, knowledge and insight helps us work with government, employers and others to change policies and practices so that together we can create a fairer and more inclusive society.

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