



**IPRT Submission to the Joint Committee on Justice on the topic of
“An examination of rehabilitative opportunities within the prison
system”**

4th March 2022

About IPRT

Established in 1994, the Irish Penal Reform Trust (IPRT) is Ireland’s leading non-governmental organisation campaigning for the rights of everyone in the penal system and the progressive reform of Irish penal policy, with prison as a sanction of last resort. IPRT publishes a wide range of evidence-informed policy positions and research documents; we campaign across a wide range of penal policy issues; and we have established IPRT as the leading independent voice in public debate on the Irish penal system.

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Executive Summary

This brief submission draws upon IPRT's research and expertise on the issues blocking rehabilitative opportunities within the prison system and upon release from prison. In particular, it draws on IPRT's annual flagship report, *Progress in the Penal System (PIPS)*. These series of reports (2017-2021) address and track progress on many key issues relating to rehabilitation in prisons. IPRT would be happy to send copies of the reports to the Committee if it would further assist.

It is key to note, as a preliminary and overarching point, that reducing prison numbers will itself assist in improving rehabilitative opportunities within the prison system. This is for the simple reason that less people means more resources and better living conditions within prison, which in turn assists rehabilitation. The Committee is asked to keep this point in mind when considering the topic of rehabilitation in Irish prisons.

The following key rehabilitative supports, services and resources are discussed in this submission: Mental and Emotional Health Supports (pp.4-6); Drug and Alcohol Addiction Services (pp.6-7); Living Conditions (pp.7-9); Education (pp.9-10); Life Skills (pp.10-11); and Staff Training and Culture (pp.11-12). The submission goes on to briefly address Post-Release Barriers and Opportunities (pp.12-14) and Obstacles to IPRT's Work (pp.14-15).

A total of 13 recommendations are made (summarised at pp.15-17). Most of these recommendations are directed towards the Irish Prison Service or Department of Justice, but it is important to note that resourcing is key to the ability of the prison system to respond effectively to the challenges mentioned in this submission and provide meaningful rehabilitative opportunities within prison.

In terms of specific legislative actions that may be of interest to the Committee, Recommendation 11 references the potential for inserting into legislation a positive statutory obligation on all relevant agencies to cooperate around prisoner release and Recommendation 12 discusses the Criminal Justice (Rehabilitative Periods) Bill 2018 and the need to progress this without further delay (in its current form, as amended at Committee).

Finally, the overarching Recommendation 13, relating to an overhaul of all data collection and publication processes within the criminal justice sector, is a matter that stretches across many agencies and departments, and accordingly must be addressed at the most senior levels.

Introduction

1. IPRT welcomes the opportunity to make a submission to the Joint Committee on Justice on the topic of ‘an examination of rehabilitative opportunities within the prison system’ and welcomes the Committee’s focus on this important issue.
2. It is important to note at the outset that many people who end up in prison have experienced issues with mental health or addiction,¹ homelessness,² disadvantage,³ low educational attainment and unemployment.⁴ The justice system is often left to “*pick up all of the pieces*” of these problems,⁵ but prison itself cannot address the broader societal issues that often lead to offending. That said, when people do end up in prison, it is crucial that they are supported in ways that will encourage their desistance and reintegration.
3. The Irish Prison Service (IPS) core mission is to provide “*safe and secure custody, dignity of care and rehabilitation to prisoners for safer communities*” (emphasis added).⁶ IPRT welcomes this focus upon rehabilitation and recognises the significant efforts made by the IPS to offer rehabilitative opportunities to those detained in our prisons.⁷
4. There are, however, numerous areas that can be improved within the prison system so as to support the rehabilitative purpose. While many of these areas are examined in comprehensive detail in IPRT’s annual flagship report, *Progress in the Penal System (PIPS)*,⁸ this submission will address only a few of the key supports, services and resources that could help improve the rehabilitative opportunities offered in Irish prisons.

¹ Gulati G, Keating N, O’Neill A, Delaunois I, Meagher D, Dunne CP (2019) The prevalence of major mental illness, substance misuse and homelessness in Irish prisoners: systematic review and meta-analyses. *Irish Journal of Psychological Medicine*: 36(1): 35- 45.

² Martynowicz, A. and Quigley M. (2010). “*It’s like stepping on a landmine . . .*” - *Reintegration of prisoners in Ireland*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/6189/its_like_stepping_on_a_landmine_reintegration_of_prisoners_in_ireland_embargoed_to_0000_tuesday_25_may_2010.pdf. [02 March 2022].

³ O’Donnell I., Teljeur C., Hughes N., Baumer E.P. and Kelly, A. (2007). ‘*When prisoners go home: punishment, social deprivation and the geography of reintegration*’. 17(4) *Irish Criminal Law Journal*: 3-9.

⁴ Central Statistics Office (CSO), (2020). *Offenders 2016: Employment, Education and Other Outcomes, 2016-2019*. [Online]. CSO. Available from:

<https://www.cso.ie/en/releasesandpublications/FP/poffo/offenders2016employmenteducationandotheroutcomes2016-2019/>. [02 March 2022].

⁵ See comments of former Director General Michael Donnellan, Houses of Oireachtas (2017). *Committee of Public Accounts Debate 2 February 2017*. [Online]. Available from: https://www.oireachtas.ie/en/debates/debate/committee_of_public_accounts/2017-02-02/5/.

⁶ Irish Prison Service (IPS), (2021). *Irish Prison Service Annual Report 2020*. [Online]. IPRT. Available from: https://www.irishprisons.ie/wp-content/uploads/documents_pdf/IPS-Annual-Report-web-FINAL.pdf. [02 March 2022]. P.5

⁷ *Examples of rehabilitative initiatives within prison include e.g. education, vocational training, healthcare, psychiatric, psychological, addiction counselling, welfare and spiritual services*, see Department of Justice, Parliamentary Questions, PQ 314, 25 November 2021 (2021), available at: <https://www.justice.ie/en/JELR/Pages/PQ-25-11-2021-314> [03 March 2022].

⁸ Irish Penal Reform Trust (IPRT), (2017-2021). *Progress in the Penal System (PIPS)*. Online. IPRT. Available from: <https://pips.iprt.ie/>. [02 March 2022].

5. As a further and overarching preliminary point, IPRT emphasises that a reduced prison population, achieved through the diversion of people away from prison wherever possible, is crucial to ensuring that prisons can focus on rehabilitation and reintegration. All of the issues discussed within this submission are adversely impacted by increased numbers within prison, for the simple reason that increased numbers stretch the resources available and have a knock-on impact on living conditions and services within the prison.⁹ This is accordingly an important part of the picture that should be considered in any discussion of rehabilitation within prisons.

Key Rehabilitative Supports and Services within the Prison System

Mental and Emotional Health Supports in the Prison System

6. The Irish prison population is characterised by issues with mental health. Recent data suggests that the prevalence of people in prison with severe mental illness is four times that of the general population.¹⁰ This is further evidenced by the consistently high numbers of people in prison on the waiting list for the Central Mental Hospital (CMH), with a persistent waiting list of between 18 and 34 people awaiting transfer from 2017-2020,¹¹ and lengthy waiting times for in-prison psychology services (e.g. as of 13th July 2021 nearly a third of the prison population were on a waiting list for psychology assessment or intervention).¹²
7. While IPRT is clear that people with mental health difficulties should not be sent to prison in the first place,¹³ it is important that there are sufficient mental and emotional health supports provided for those who do end up in prison. This unfortunately is not the case within our prison system, with several problems arising in respect of both the quantity and quality of

⁹ You can find more information on safe custody limits and issues of overcrowding in Standards 3 and 4 of the PIPS reports.

¹⁰ Gulati, G., Cusack, A., Kelly, B.D., Murphy, V.E., Kilcommins, S., & Dunne, C.P. (2021). Trans-institutionalisation in Ireland: New and Emerging Congregated Settings for People with Disabilities. [Online]. *Health and Human Rights Journal*. Available online: <https://www.hhrjournal.org/2021/08/trans-institutionalisation-in-ireland-new-and-emerging-congregatedsettings-for-people-with-disabilities/>. [02 March 2022].

¹¹ From 2017 to 2020, there was a constant waiting list of between 18 and 34 people awaiting transfer to the CMH see, Irish Prison Service response to requests for PIPS 2020, 7 August 2020. See, Irish Penal Reform Trust (IPRT), (2020). *Progress in the Penal System: Assessing Progress in a Pandemic*. [Online]. IPRT.

Available from: <https://pips.iprt.ie/site/assets/files/Progress-in-the-Penal-System-2020.pdf>. [03 March 2022]. P.83

¹² Department of Justice, Parliamentary Questions, PQ 579, 13 July 2021 (2021), available at: <https://www.justice.ie/en/JELR/Pages/PQ-13-07-2021-579>. In IPRT's most recent *PIPS 2021* report, it was noted that as of 23rd November 2021, the range of wait times for assessment/intervention by the IPS Psychology Service was between 0 (for psychological first aid) and 1,732 days (4 years) (for the *Pathways to Change Group*), see information obtained by the Irish Prison Service on 18th November 2021, Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The need for transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. P.15.

¹³ This also appears to be a goal of the recently established High Level Task Force on the mental health and addiction challenges of persons interacting with the criminal justice system, see, Department of Justice (DoJ), (2021). *Establishment of a High-Level Taskforce to consider the mental health and addiction challenges of persons interacting with the criminal justice system*. [Online]. DoJ. Available from: <https://www.justice.ie/en/JELR/Pages/PR21000071>. [02 March 2022]. See also IPRT's presentation to the HLTF in July 2021, IPRT, (2021). *IPRT presentation to High Level Task Force on mental health and addiction*. [Online]. IPRT. Available from: <https://www.iprt.ie/latest-news/iprt-to-present-to-high-level-task-force-on-mental-health-and-addiction/> [03 March 2022].

mental health supports in prison. For example, in addition to the lengthy waiting lists mentioned above:

- a. There are only two High Support Units (HSUs) available to people in prison in Ireland, one in Cloverhill and one in Mountjoy, with an additional Vulnerable Prisoners Unit in Cork Prison.¹⁴ Concerns as to the quality of the existing HSUs was pointed out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) in their 2014¹⁵ and 2019¹⁶ visits to Ireland.
- b. Ireland is nowhere near the recommended standard of 1 psychologist per 150 prisoners,¹⁷ with only 1 psychologist per 257 prison beds reported in November 2021.¹⁸
- c. There remains a lack of critical data on the lengths of time people are spending in Safety Observation Cells (special cells designed to accommodate prisoners who pose “an immediate threat of serious harm to him/herself and/or others arising from a health care condition (i.e. as a medical measure)”¹⁹). This is despite repeated recommendations from IPRT to publish this information²⁰ and a 2017 commitment by the IPS to do so.²¹

Recommendation 1. The IPS should carry out a mapping exercise of all psychological, psychiatric and other mental health supports available to people in prison, with a view to identifying the areas where increased resourcing is needed.

¹⁴ There are only two operational HSUs in the estate, see, Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: Transparency in the Penal System*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_final.pdf. [02 March 2022]. P.34.

¹⁵ CPT found that High Support Units were not resourced properly and observed a lack of meaningful engagement and structured activities for mentally ill prisoners housed in HSUs. See, Council of Europe (CoE), (2015). *Report to the Government of Ireland on the visit to Ireland carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 16 to 26 September 2014*. [Online]. CoE. Available from: <https://rm.coe.int/pdf%201680727e23>. [02 March 2022].

¹⁶ CPT noted that in Cloverhill, vulnerable prisoners in the “overflowing” HSU were, on occasion, sleeping on mattresses. See, Council of Europe (CoE), (2020). *Report to the Government of Ireland on the visit to Ireland carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 23 September to 4 October 2019*. [Online]. CoE. Available from: <https://rm.coe.int/1680a078cf>. [02 March 2022]. P.57.

¹⁷ Porporino, F. (2015), “New Connections” *Embedding Psychology Services and Practice in the Irish Prison Service*. [Online]. IPS. Available from: http://www.irishprisons.ie/wp-content/uploads/documents_pdf/porporino_report.pdf. [02 March 2022]. P.28.

¹⁸ Information Received by the IPS on 18th November 2021, see Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: Transparency in the Penal System*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_final.pdf. [02 March 2022]. P.15.

¹⁹ Council of Europe (CoE), (2020). *Report to the Government of Ireland on the visit to Ireland carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 23 September to 4 October 2019*. [Online]. CoE. Available from: <https://rm.coe.int/1680a078cf>. [02 March 2022]. P.15.

²⁰ These repeated recommendations have been made by IPRT in successive editions of PIPS, and particularly in 2017, 2018, 2019 and 2021, see See *Standard 13 – Mental Healthcare*, in Irish Penal Reform Trust (IPRT), (2017-2019). *Progress in the Penal System: A Framework for Penal Reform*. [Online]. [IPRT]. Available from: <https://pips.iprt.ie/>. [02 March 2022]; and Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_final.pdf. [02 March 2022].

²¹ UN Web TV, (2017). *Consideration of Ireland (Cont'd)-1551st Meeting 61st Session Committee Against Torture*. at 12.29-12.38. [Online]. Available from: <https://media.un.org/en/asset/k1x/k1xjaag18m>. [02 March 2022].

Recommendation 2. The IPS should regularly publish the average, minimum and maximum lengths of time individuals are kept in Safety Observation Cells.

Drug and Alcohol Addiction Services in the Prison System

8. While there is a lack of up-to-date information on the prevalence of addiction among the Irish prison population, a 2019 study estimated that one in every two prisoners presented with substance misuse / dependence issues.²² However, these figures are based on incomplete data. Alongside this lack of information on addiction in prisons, there is a dearth of information available around drug and alcohol treatment services within the prison system.²³
9. That said, the information that is available does not paint an overly positive picture. For example:
 - a. As of 1st March 2021, 531 prisoners (13.9% of the prison population) were waiting to access addiction counselling services.²⁴ The lack of addiction counselling services has previously been highlighted by Prison Visiting Committees.²⁵
 - b. While people in prison who wish to avail of drug treatment services have access to counselling, treatment and training, there appear to be limited harm reduction options available (with no access to needle exchange facilities or naloxone provided (except on release from prison and in emergency situations)).²⁶
10. As well as significant issues around data on drug use and treatment options in prisons, the IPS drugs policy, *Keeping Drugs Out of Prison*, is considerably outdated having been published in 2006.²⁷ This policy sets a zero-tolerance approach to drugs in prison under principle 1, which arguably contradicts the *National Drugs Strategy 2017-2025* focus on “reducing harm, supporting recovery”.²⁸ IPRT is of the view that the IPS policy on drugs should be updated so

²² G. Gulati, N. Keating, A. O’Neill, I. Delaunoy, D. Meagher, and C. P. Dunne, “The prevalence of major mental illness, substance misuse and homelessness in Irish prisoners: systematic review and meta-analyses”, *Irish Journal of Psychological Medicine*, 36/1 (2019), pp. 35–45

²³ Most of the information publicly available on drug/alcohol addiction services comes from answers to Parliamentary Questions.

²⁴ Department of Justice (DoJ). (2021). Parliamentary Question 181, 11 March 2021. [Online]. DOJ. Available from: <https://www.justice.ie/en/JELR/Pages/PQ-11-03-2021-181>. Percentage calculated on basis of total number of people in prison on 1 March 2021, see IPS. (2021). *Prisoner Population on Monday 1 March 2021*. [Online]. IPS. Available from: https://www.irishprisons.ie/wp-content/uploads/documents_pdf/01-March-2021.pdf.

²⁵ Department of Justice (DoJ). (2019). *Annual Report 2017 from Cloverhill visiting Committee to the Minister for Justice Charles Flanagan* [Online]. Department of Justice. Available from: [https://www.justice.ie/en/JELR/Cloverhill Prison Visiting Committee Annual Report 2017.pdf/Files/Cloverhill Prison Visiting Committee Annual Report 2017.pdf](https://www.justice.ie/en/JELR/Cloverhill%20Prison%20Visiting%20Committee%20Annual%20Report%202017.pdf/Files/Cloverhill%20Prison%20Visiting%20Committee%20Annual%20Report%202017.pdf). [03 March 2022]. P.8.

²⁶ Kildare Street, (2021). Written answers: Thursday, 25 November 2021 - Department of Justice and Equality Prison Service. [Online]. Kildare Street. Available from: <https://www.kildarestreet.com/wrans/?id=2021-11-25a.818>. [03 March 2022].

²⁷ Irish Prison Service (IPS), (2006). *Keeping Drugs Out of Prisons: Drugs Policy & Strategy*. [Online]. IPS. Available from: <http://www.irishprisons.ie/wp-content/uploads/documents/drugspolicy.pdf>. [02 March 2022].

²⁸ Department of Health, (2017). *Reducing Harm, Supporting Recovery: A health-led response to drug and alcohol use in Ireland 2017-2025*. [Online]. Government of Ireland. Available from: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/14571/c22d1dd1756440f8946717a80ad2ffc3.pdf#page=1>. [02 March 2022].

as to focus efforts on addressing demand through targeted drug treatment programmes (rather than focusing simply on supply). This would in turn place greater emphasis on making Irish prisons a more rehabilitative environment and closer align with the national response to drug and alcohol use.²⁹

Recommendation 3. The IPS should publish an updated drugs policy, that takes a health-led approach to drug use within prisons, without delay.

Living Conditions in the Prison System

11. The European Prison Rules set out the principle that “*life in prison shall approximate as closely as possible the positive aspects of life in the community*”.³⁰ Living conditions cover many different areas of prison life such as cell-sharing and out-of-cell time, as well as the physical environment of the prison. Such conditions underpin the ability of the prison system to promote its rehabilitative purposes, insofar as safe, stable and comfortable accommodation is essential to allowing prisoners the space to engage with relevant services.
12. IPRT has identified various concerns in regards the living conditions within Irish prisons, but this brief submission focuses on just two aspects: single-cell accommodation and out-of-cell time.
13. Single-cell accommodation facilitates both the dignity and privacy of prisoners and can reduce the risk of violence (insofar as it avoids people being crowded together in small, cramped cells).³¹ Despite numerous human rights instruments emphasising the importance of single-cell accommodation,³² only 54% of people in Irish prisons are accommodated in single cells (as of January 2022) and the IPS does not have a designated policy on cell-sharing.³³

²⁹ Further discussion of the impact of drugs on the prison environment is set out in the *PIPS 2021* report, Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from:

https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. Pp.37-41.

³⁰ ³⁰ Council of Europe (CoE), (2020). Revised European Prison Rules. [Online]. CoE. Available from:

https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016809ee581. [02 March 2022]. Basic Principle 5.

³¹ Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from:

https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. P.52.

³² See: United Nations Office on Drugs and Crime, (2015). *The United Nations Standard Minimum Rules for the Treatment of Prisoners*. [Online].

UNODC. Available from: https://www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-Eebook.pdf. [02 March 2022]. P.5,

Rule 12.1.; and Council of Europe (CoE), (2020). *Revised European Prison Rules*. [Online]. CoE. Available from:

https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016809ee581. [02 March 2022]. Rule 18.6.

³³ Irish Prison Service (IPS), (2022). *Census Prison Population January 2022 – Cell occupancy – In-Cell Sanitation*. [Online]. IPS. Available from:

https://www.irishprisons.ie/wp-content/uploads/documents_pdf/January-2022-In-Cell.pdf. [02 March 2022]. See also Irish Penal Reform Trust

(IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from:

https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. P.16.

14. Adequate out-of-cell time, which allows prisoners time for routine activities (such as showering and phone calls) as well as purposeful activity (such as exercise, education, work and opportunities to engage with others), is vitally important for the rehabilitation and reintegration of people post-release.³⁴ IPRT believes that every prisoner should receive a minimum of 12 hours per day out of their cell, which should include a minimum of five hours structured and meaningful activity over five days per week.³⁵ This echoes similar calls by the Penal Policy Review Group (PPRG) in 2014³⁶ and the Whitaker Report as far back as 1985.³⁷
15. Unfortunately, the most recent *PIPS 2021* report has recorded a regress on this important issue, with the number of hours out-of-cell time that prisoners receive reducing from eight hours in 2018³⁸ to six hours in 2021.³⁹ This is just one hour more out-of-cell time than people on a ‘restricted regime’ (a restricted regime being where a prisoner spends 19+ hours a day locked in their cell).⁴⁰
16. The situation in regards people on restricted regime is further alarming insofar as IPRT has identified a 79% increase in the number of people held in such conditions between 2017 and 2021.⁴¹ This figure increased again in January 2022, with 25.6% (982) of the prison population (3,835) being held on restricted regime.⁴² It is widely accepted that spending such a significant portion of the day locked in a cell is damaging to the health and wellbeing of the restricted individual.⁴³ While these increased numbers on lengthy lock-up is partially a result of COVID-19, it is crucial that efforts are now made to address these concerning figures and trends.

³⁴ This is reflected across a number of human rights standards, see: United Nations Office on Drugs and Crime (UNODC), (2015). *The United Nations Standard Minimum Rules for the Treatment of Prisoners*. [Online]. UNODC. Available from: https://www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-E-ebook.pdf. [02 March 2022]. Rules 5 & 23; Council of Europe (CoE), (2020). *Recommendation Rec(2006)2-rev of the Committee of Ministers to member States on the European Prison Rules (Adopted by the Committee of Ministers on 11 January 2006, at the 952nd meeting of the Ministers’ Deputies and revised and amended by the Committee of Ministers on 1 July 2020 at the 1380th meeting of the Ministers’ Deputies)*. [Online]. CoE. Available from: <https://rm.coe.int/09000016809ee581>. [02 March 2022]. Rule 25.

³⁵ This is set out in Standard 16 of *PIPS*, see <https://pips.iprt.ie/progress-in-the-penal-system-pips-2020/part-2-measuring-progress-against-the-standards/2-prison-conditions-and-regimes/16-out-of-cell-time/>. [Online]. [03 March 2022].

³⁶ Department of Justice (DoJ), (2014). *Strategic Review of Penal Policy*. [Online]. DOJ. Available from: <http://www.justice.ie/en/JELR/Strategic%20Review%20of%20Penal%20Policy.pdf/Files/Strategic%20Review%20of%20Penal%20Policy.pdf> [02 March 2022]. “Lower security prisons permit greater out-of-cell time, or no ‘locked cell’ time in the case of an open prison. This is a particular advantage in the rehabilitation and reintegration of an offender as it resembles more closely a normal day to day existence.” P.59.

³⁷ Committee of Inquiry into the Penal System. (1985). *Report of the Committee of Inquiry into the Penal System*. Dublin: Stationery Office.

³⁸ Houses of the Oireachtas, (2018). Prison Service Data, Parliamentary Question 551, 17th April 2018. [Online]. Houses of the Oireachtas. Available from: <https://www.oireachtas.ie/en/debates/question/2018-04-17/section/465/>. [02 March 2022].

³⁹ This is based on information provided by the IPS in November 2021, see Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. P.56.

⁴⁰ There are several prison rules under which a prisoner can be placed on restricted regime in Ireland, see e.g. Irish Prison Service, (2007). *Irish Prison Rules 2007*. [Online]. IPS. Available from: <http://www.irishprisons.ie/images/pdf/prisonrules.pdf>. [03 March 2022]. Rules 62, 63, 64, 67 (and section 13 of the Prisons Act 2007).

⁴¹ Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System (PIPS): The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. P.56.

⁴² See Irish Prison Service (IPS). *Census of Restricted Regime Prisoners January 2022*. [Online]. IPS. Available from: https://www.irishprisons.ie/wp-content/uploads/documents_pdf/January-2022-Restriction.pdf. [02 March 2022].

⁴³ See e.g. Department of Justice (DoJ), (2014). *Strategic Review of Penal Policy*. [Online]. DOJ. Available from: <https://www.justice.ie/en/JELR/Pages/PB14000244> [03 March 2022]. Recommendation 17, P.10.

17. The above factors, alongside other basic living conditions, play a major role in determining the rehabilitative outcomes for people in prison and must be addressed alongside specific rehabilitative initiatives.

Recommendation 4. The IPS should carry out a review of the use of single-cell accommodation across the Irish prison estate before the end of 2022 and consider developing and publishing a designated policy on cell-sharing.

Recommendation 5. The IPS should publish a dedicated strategy for reducing the use of restricted regimes across the prison estate (as promised in 2016),⁴⁴ as well as its plans for moving out of the emergency phase of the COVID-19 pandemic.⁴⁵

Education in the Prison System

18. Education in prison is important to the personal development of prisoners and has the potential to reduce the pains of, and damage caused by, imprisonment. It can further provide individuals with the skills needed to re-engage with their communities and enhance people's employability post-release.⁴⁶ While there have been some positive initiatives in recent years, including the Mountjoy Prison-Maynooth University Partnership,⁴⁷ IPRT remains concerned by the level of education provision and participation within the prison system.

19. For example, there was a regress in participation rates in education in Irish prisons between 2017 and 2021, from 42% in March 2017⁴⁸ to 31.2% in November 2021.⁴⁹ There has also been significant regress in the efforts to address access to education for people on restricted regime

⁴⁴ This commitment was made in the IPS Strategic Plan 2016-2018, see Irish Prison Service (IPS), (2016). *Irish Prison Service Strategic Plan, 2016-2018*. [Online]. IPS. Available from: http://www.irishprisons.ie/wp-content/uploads/documents_pdf/strategic_plan_2016.pdf [16 November 2021]. Goal 4.4, P.36.

⁴⁵ This might be done e.g. by publishing the *Framework for Unwinding Prison Restrictions* as promised in June 2021 (but which has not yet been done), see Department of Justice, Parliamentary Questions, PQ 394, 17 June 2021 (2021), available at: <https://www.justice.ie/en/JELR/Pages/PQ-17-06-2021-394> [03 March 2022].

⁴⁶ See e.g. Behan, C., (2014). Learning to Escape: Prison Education, Rehabilitation, and the Potential for Transformation. *Journal of Prison Education and Re-entry*, 1(1): 20-31; United Nations Office on Drugs and Crime, (2015). *The United Nations Standard Minimum Rules for the Treatment of Prisoners*. [Online]. UNODC. Available from: https://www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-E-ebook.pdf. [02 March 2022]. (See Rules 4, 40, 92, 102 & 104); and Houses of the Oireachtas Joint Committee on Education and Skills, (2019). *Joint Committee on Education and Skills Report on Education Inequality & Disadvantage and Barriers to Education* [Online]. Houses of the Oireachtas Joint Committee on Education and Skills. Available from:

https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_education_and_skills/reports/2019/2019-06-05_report-on-education-inequality-disadvantage-and-barriers-to-education_en.pdf. [02 March 2022]. The Joint Committee on Education and Skills has recommended that education programmes in prisons be "developed and expanded" as it is necessary for reintegration to society on release.,

⁴⁷ See Maynooth University, (2021). *Mountjoy Prison – Maynooth University Partnership*. [Online]. MU. Available from: <https://www.maynoothuniversity.ie/access-office/mountjoy-mu-partnership>. [03 March 2022].

⁴⁸ Kildare Street, (2017). *Written answers Tuesday, 11 July 2017 - Educational Services for Prisoners*. [Online]. Kildare Street. Available from: <https://www.kildarestreet.com/wrans/?id=2017-07-11a.731>. [02 March 2022].

⁴⁹ Information received by the Irish Prison Service on 18 November 2021.

as well as a consistent lack of information on participation rates in education among this cohort of prisoners.⁵⁰ There is similarly a lack of information on participation rates in Open University courses for people in prison, with no information on this topic made available to IPRT since 2018.⁵¹ In addition to these issues, IPRT is concerned by the recent impact of COVID-19 on prison education e.g. schools were closed for lengthy periods of time in 2020 and 2021 due to the pandemic⁵² as well as for reasons of staff shortages across the prison estate.⁵³

Recommendation 6. The IPS and Education & Trainings Board Ireland (ETBI) should follow through on commitments to the digitalisation of education⁵⁴ and ensure that all prisoners, particularly those on restricted regimes, have access to in-cell e-learning by the end of 2022.

Life Skills in the Prison System

20. The development of life skills in prison can help to promote reintegration and minimise the risk of reoffending.⁵⁵ Life skills is a broad concept and can refer to many things, from structured courses to carrying out everyday activities such as preparing meals, eating communally, and cleaning / maintaining a living space.
21. *PIPS 2021* explains that there is a mixed picture in regards the progress in encouraging and facilitating prisoners to develop their life skills. For example:
 - a. There was a regress in regards communal dining (with fewer than 200 people across the whole prison estate having access to communal dining facilities in 2021).⁵⁶
 - b. There has been, however, some improvement in the provision of Independent Living Skills Units (ILSUs) in Irish prisons. ILSUs are specific areas within closed prisons where

⁵⁰ Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. See P. 78.

⁵¹ Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. See P.78.

⁵² Schools we closed in prison from approx. mid-March to early June 2020 and again from January to mid-April 2021. This is based on information received by the Irish Prison Service on 14th January 2022, see Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. See P.77.

⁵³ For example, schools were closed in Limerick and Mountjoy prisons due to staff shortages, see information received by the Irish Prison Service on 14th January 2022, Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. See P.19.

⁵⁴ See Irish Prison Service (IPS) & Education and Training Boards Ireland (ETB), (2016). *Joint Irish Prison Service/ Education and Training Boards Ireland – Prison Education Strategy 2016-2018*. [Online]. IPS. Available from: https://www.irishprisons.ie/wp-content/uploads/documents_pdf/education_strategy_2016.pdf [03 March 2022]. P.7; and Irish Prison Service (IPS) & Education and Training Boards Ireland (ETB), (2019). *Joint Irish Prison Service/ Education and Training*

Boards Ireland – Prison Education Strategy 2019-2022. [Online]. IPS. Available from: https://www.irishprisons.ie/wp-content/uploads/documents_pdf/Irish-Prison-Service-Joint-Education-Strategy_PRINT-final.pdf [03 March 2022]. Pp.5-6.

⁵⁵ Eikeland, O., Asbjørnsen, T.M.A., (2009) *Education in Nordic Prisons Prisoners' Educational Backgrounds, Preferences and Motivation*. [Online]. Norden. Available from: <https://www.diva-portal.org/smash/get/diva2:702625/FULLTEXT01.pdf>. [02 March 2022].

⁵⁶ Information obtained from the Irish Prison Service on 18 November 2021, see Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. See P.18.

prisoners (specifically those on longer sentences) can carry out “normal” life activities in so far as possible within the prison regime. There are currently two ILSUs (in Wheatfield and Midlands) with another due to open in Mountjoy at the end of 2018 (although that does not yet appear to have happened).⁵⁷

Recommendation 7. The IPS should conduct and publish a review on the role and effectiveness of ILSUs in the prison system and consider the potential for further development of ILSUs or other “normalisation” initiatives across the estate.

Staff Training and Culture in the Prison System

22. The careful selection, recruitment and training of prison staff, as well as the overall culture of the prison system, is essential to ensuring that Irish prisons remain focused on rehabilitation and promoting desistance and reintegration.⁵⁸ Good working relationships both between and among staff and prisoners can help ensure a positive prison environment, which in turn supports the rehabilitative purpose of prison.⁵⁹

23. As it stands, current prison staff and new recruits receive training on a range of topics including: human rights in a custodial environment; equality and diversity; mental health awareness; effects of addiction; and learning styles and learning difficulties.⁶⁰ It is important, however, that this training is complemented by robust mechanisms that ensure staff feel supported by management in the fulfilment of their duties.

24. ‘Measuring the quality of prison life’ (MQPL) surveys is an additional tool that can assist in assessing those ‘hard to measure’ aspects of prison life and quality.⁶¹ While the IPS has previously carried out these types of surveys internally, it does not appear that they have been published.⁶²

⁵⁷ Information provided by the Irish Prison Service on an IPRT visit to the Progression Unit, Mountjoy Prison, 18th May 2018 in Irish Penal Reform Trust (IPRT), (2017). *Progress in the Penal System: A Framework for Penal Reform in Ireland*. [Online]. IPRT. Available from:

https://www.iprt.ie/site/assets/files/6431/progress_in_the_penal_system_compressed.pdf. [03 March 2022]. See also Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. See P.74.

⁵⁸ See e.g. United Nations Office on Drugs and Crime, (2015). *The United Nations Standard Minimum Rules for the Treatment of Prisoners*. [Online]. UNODC. Available from: https://www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-E-ebook.pdf [02 March 2022]. P.22, Rule 74.1.; and Council of Europe (CoE), (2020). *Revised European Prison Rules*. [Online]. CoE. Available from: https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016809ee581. [02 March 2022]. Rule 8.

⁵⁹ See e.g. Standard 30 of *PIPS*, Irish Penal Reform Trust (IPRT), (2019). *Progress in the Penal System: A framework for penal reform*. [Online]. IPRT. Available from: <https://pips.iprt.ie/site/assets/files/Progress-in-the-Penal-System-2019.pdf> [02 March 2022]. P.101.

⁶⁰ Irish Prison Service (IPS), (2021). *Irish Prison Service Annual Report 2020*. [Online]. IPRT. Available from: https://www.irishprisons.ie/wp-content/uploads/documents_pdf/IPS-Annual-Report-web-FINAL.pdf. [02 March 2022]. P.17.

⁶¹ See Council of Europe, (2014). *Prison quality, moral performance and outcomes – Alison Liebling*. [Online]. CoE. Available from: <https://rm.coe.int/16806f4613>. [03 March 2022]. P.1.

⁶² Irish Penal Reform Trust (IPRT), (2019). *Progress in the Penal System: A framework for penal reform*. [Online]. IPRT. Available from: <https://pips.iprt.ie/site/assets/files/Progress-in-the-Penal-System-2019.pdf> [02 March 2022]. P.101.

25. Finally, IPRT is unclear as to whether previous commitments to introduce a new prison governance structure, including a committee to look at culture, have yet been met.⁶³ These commitments were made in 2019 in response to a report of the Inspector of Prisons into allegations of wrongdoing in the IPS. The most recent IPS Annual Report 2020 does not specifically reference the status of such measures, mentioning only that governance is a “key pillar” in the IPS Strategic Plan 2019-2022 and that “[w]ork is ongoing by the Department of Justice and the Irish Prison Service to design an enhanced governance framework for the Prison Service which will strengthen governance, compliance and accountability”.⁶⁴

Recommendation 8. The IPS should embed staff training on human rights and promoting reintegration by including such training in Performance Management and Development Systems (PMDS), promotion and overall performance appraisal.

Recommendation 9. The IPS should conduct and publish independent MQPL surveys across the prison estate on a periodic basis.

Recommendation 10. The Department of Justice / IPS should provide an update on progress of a new prison governance structure as per the commitments made in 2019.

Post-Release Barriers and Opportunities

26. There are huge barriers facing people upon their release from prison, and this particular period can be one of the most challenging for people. Even when prison life is managed effectively and successful programmes are in place in prison, challenges to reintegration remain. This is often due to a lack of follow-up and support post-release,⁶⁵ not to mention access to stable accommodation, employment and other aspects of normal life. Special attention must accordingly be given to supporting people on release from prison as part of the wider goal of preventing re-offending.

⁶³ Department of Justice, (2019). Statement by Minister for Justice and Equality, Charlie Flanagan TD, accompanying the publication of the report by Inspector of Prisons pursuant to section 31(2) of the Prisons Act 2007 into allegations of wrongdoing in the Irish Prison Service. [Online]. DoJ. Available from: <https://www.gov.ie/en/press-release/70f9f0-statement-by-minister-for-justice-and-equality-mr-charlie-flanagan-t/> [03 March 2022].

⁶⁴ Irish Prison Service (IPS), (2021). *Irish Prison Service Annual Report 2020*. [Online]. IPRT. Available from: https://www.irishprisons.ie/wp-content/uploads/documents_pdf/IPS-Annual-Report-web-FINAL.pdf. [02 March 2022]. P.14.

⁶⁵ United Nations Office on Drugs and Crime (UNODC), (2018). *Introductory Handbook on the Prevention of Recidivism and the Social Reintegration of Offenders – Criminal Justice Handbook Series*. [Online]. UNODC. Available from: https://www.unodc.org/documents/justice-and-prison-reform/18-02303_ebook.pdf [03 March 2022].

27. There are many aspects to this, but IPRT emphasises three key areas where efforts might particularly be focused:

- a. Sentence-management and planning. It is crucial that all prisoners have access to effective sentence-management and a comprehensive plan for release in place, with such preparations starting at the beginning of the person's sentence.⁶⁶
- b. Interagency coordination around release. There should be robust interagency working and coordination between prisons and other relevant departments / agencies in the community so as to ensure people, upon release, have access to essential services such as housing, education, employment, family support and – if needed – mental health and addiction supports.⁶⁷
- c. Spent convictions. The importance of a more expansive and effective spent convictions regime cannot be overstated. Such measures would ensure people who have convictions are not unduly challenged in accessing important elements of everyday life, such as employment, education and travel.⁶⁸

28. There has been some progress on these issues, with the Interagency Group for a Fairer and Safer Ireland established in 2018 to take forward recommendations on enhancing cross-government and interagency co-operation in the management and rehabilitation of offenders⁶⁹ and the Criminal Justice (Rehabilitative Periods) Bill 2018 passing through the Seanad with Government support in June 2021.⁷⁰ In its current form (as amended at Committee stage) this Bill will benefit thousands who have been held back by their historic conviction(s), and communities across Ireland will benefit from the education and employment of people who were previously excluded based on their convictions history.⁷¹

29. On the question of industries / sectors engaging with the prison system on training and employment, IPRT agrees that there may be benefits to such initiatives and we are supportive

⁶⁶ See e.g. the Mandela Rules, United Nations Office on Drugs and Crime, (2015). *The United Nations Standard Minimum Rules for the Treatment of Prisoners*. [Online]. UNODC. Available from: https://www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-Eebook.pdf. [02 March 2022]. Rules 4, 87 and 88.

⁶⁷ Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. P.86.

⁶⁸ Houses of the Oireachtas, (2018). *Joint Committee on Justice and Equality Report on Penal Reform and Sentencing*. [Online]. Houses of the Oireachtas. Available from: https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_justice_and_equality/reports/2018/2018-05-10_report-on-penal-reform-and-sentencing_en.pdf [03 March 2022]

⁶⁹ Department of Justice (DoJ), (2020). *Annual Report of the Interagency Group for a Fairer and Safer Ireland, 2019*. [Online]. DoJ. Available from: https://www.justice.ie/en/JELR/Pages/Penal_Policy_Review [03 March 2022]. P. 2.

⁷⁰ Houses of the Oireachtas, (2018). *Criminal Justice (Rehabilitative Periods) Bill 2018*. [Online]. Houses of the Oireachtas. Available from: <https://www.oireachtas.ie/en/bills/bill/2018/141/> [03 March 2022].

⁷¹ Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. P.89.

of the recent efforts that have been made by the Department of Justice in this regard (through e.g. the *Working to Change - Social Enterprise & Employment Strategy 2021-2023* launched in November 2020).⁷²

Recommendation 11. The Department of Justice, by the end of 2022, should develop a strategy which identifies the key stakeholders responsible for ensuring the successful reintegration of people post-release and the potential for inserting into legislation a positive statutory obligation on all relevant agencies to cooperate around prisoner release.

Recommendation 12. The Government should progress the Criminal Justice (Rehabilitative Periods) Bill 2018 through the Dáil without further delay, and without removing the progressive amendments made at Committee Stage.

Obstacles to IPRT's Work

30. The last question posed by the Committee asks if there are any policies or procedures which impede on IPRT's ability to carry out our functions effectively and to the best of our ability. A key challenge arising for IPRT is the difficulty we have in accessing data on key aspects of the Irish criminal justice and penal system. A system for publishing routine, up-to-date and comprehensive data simply does not exist at present. Without such data and information, IPRT struggles to assess Ireland's prison system across a range of important issues, including many of those mentioned in this submission. This difficulty in obtaining data is the reason that the overarching theme of *PIPS 2021* was 'the need for transparency'.⁷³

31. As stated by Chief Commissioner Sinéad Gibney at the launch of this year's *PIPS 2021* report, "*what we cannot measure, we cannot change*".⁷⁴ **Underpinning all of the above recommendations is accordingly an overarching and urgent recommendation for all relevant agencies, across the criminal justice sector, to introduce systemised, comprehensive and routine data collection and data publication processes.**⁷⁵ The importance of access to such information cannot be overstated. Without it, we are left

⁷² Visit the Working to Change website for more information, available from: <https://www.workingtochange.ie/>.

⁷³ See Irish Penal Reform Trust (IPRT), (2021). *Progress in the Penal System: The Need for Transparency*. [Online]. IPRT. Available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022]. Pp.11-13.

⁷⁴ You can watch the Chief Commissioner's remarks back here: <https://www.youtube.com/watch?v=REXvFaDMw68> (at 24.14-40.31).

⁷⁵ More information on specific data / information gaps and requirements is set out in comprehensive detail throughout *PIPS 2021*, available from: https://www.iprt.ie/site/assets/files/7052/progress_in_the_penal_system_2021_-_final.pdf. [02 March 2022].

knowing very little about what is happening in our prisons and are hampered in our ability to fully advocate for the rights and wellbeing of some of the most marginalised people in our society.

Recommendation 13. The Government and Department of Justice should lead on an overhaul of all data collection and publication processes within the criminal justice sector, so as to provide for the systematic, comprehensive and routine collection and publication of relevant data.

Conclusion and Summary of Recommendations

32. The above information is a brief overview of some key aspects of promoting and improving rehabilitative opportunities within the prison system. IPRT would very much welcome the opportunity to meet with the Committee to discuss this important topic further and is happy to answer any questions that might arise.

Recommendation 1. The IPS should carry out a mapping exercise of all psychological, psychiatric and other mental health supports available to people in prison, with a view to identifying the areas where increased resourcing is needed.

Recommendation 2. The IPS should regularly publish the average, minimum and maximum lengths of time individuals are kept in Safety Observation Cells.

Recommendation 3. The IPS should publish an updated drugs policy, that takes a health-led approach to drug use within prisons, without delay.

Recommendation 4. The IPS should carry out a review of the use of single-cell accommodation across the Irish prison estate before the end of 2022 and consider developing and publishing a designated policy on cell-sharing.

Recommendation 5. The IPS should publish a dedicated strategy for reducing the use of restricted regimes across the prison estate (as promised in 2016),⁷⁶ as well as its plans for moving out of the emergency phase of the COVID-19 pandemic.⁷⁷

Recommendation 6. The IPS and Education & Trainings Board Ireland (ETBI) should follow through on commitments to the digitalisation of education⁷⁸ and ensure that all prisoners, particularly those on restricted regimes, have access to in-cell e-learning by the end of 2022.

Recommendation 7. The IPS should conduct and publish a review on the role and effectiveness of ILSUs in the prison system, and consider the potential for further development of ILSUs or other “normalisation” initiatives across the estate.

Recommendation 8. The IPS should embed staff training on human rights and promoting reintegration by including such training in Performance Management and Development Systems (PMDS), promotion and overall performance appraisal.

Recommendation 9. The IPS should conduct and publish independent MQPL surveys across the prison estate on a periodic basis.

Recommendation 10. The Department of Justice / IPS should provide an update on progress of a new prison governance structure as per the commitments made in 2019.

Recommendation 11. The Department of Justice, by the end of 2022, should develop a strategy which identifies the key stakeholders responsible for ensuring the successful reintegration of people post-release and the potential for inserting into legislation a positive statutory obligation on all relevant agencies to cooperate around prisoner release.

⁷⁶ This commitment was made in the IPS Strategic Plan 2016-2018, see Irish Prison Service (IPS), (2016). *Irish Prison Service Strategic Plan, 2016-2018*. [Online]. IPS. Available from: http://www.irishprisons.ie/wp-content/uploads/documents_pdf/strategic_plan_2016.pdf. [02 March 2022]. Goal 4.4, P.36.

⁷⁷ This might be done e.g. by publishing the *Framework for Unwinding Prison Restrictions* as promised in June 2021 (but which has not yet been done), see Department of Justice, Parliamentary Questions, PQ 394, 17 June 2021 (2021), available at: <https://www.justice.ie/en/JELR/Pages/PQ-17-06-2021-394> [03 March 2022].

⁷⁸ See Irish Prison Service (IPS) & Education and Training Boards Ireland (ETB), (2016). *Joint Irish Prison Service/ Education and Training Boards Ireland – Prison Education Strategy 2016-2018*. [Online]. IPS. Available from: http://www.irishprisons.ie/wp-content/uploads/documents_pdf/education_strategy_2016.pdf [02 March 2022]. P.7.

Recommendation 12. The Government should progress the Criminal Justice (Rehabilitative Periods) Bill 2018 through the Dáil without further delay, and without removing the progressive amendments made at Committee Stage.

Recommendation 13. The Government and Department of Justice should lead on an overhaul of all data collection and publication processes within the criminal justice sector, so as to provide for the systematic, comprehensive and routine collection and publication of relevant data.