EPIC Risk Management’s
HARM-MINIMISATION PROJECT:
CRIMINAL JUSTICE SYSTEM
Evaluation report for GambleAware
Final: 18 April 2019
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i Acknowledgements

Chrysalis Research would like to thank all members of staff within GambleAware (formerly the Responsible Gambling Trust) and EPIC Risk Management, as well as all other stakeholders who have been involved in this evaluation, for their time and participation in one-to-one and/or multi-way interviews with the evaluation team.

Chrysalis Research would also like to thank GambleAware and particularly EPIC Risk Management for providing the relevant documentary evidence and enabling evaluator access to other stakeholders who had been involved in the project in partner or beneficiary capacity.

It is hoped that this report will recognise the project and delivery team’s achievements and also identify areas where improvement or further development in carrying out similar work is needed, to strengthen both the commissioner’s and delivery provider’s capacity and systems.

ii List of abbreviations

- CBT: Cognitive behavioural therapy
- CJS: Criminal justice system
- CORE: Clinical Outcomes in Routine Evaluation
- CRC: Community rehabilitation company
- HMP: Her Majesty’s prison
- ITT: Invitation to tender, project specification
- KPI: Key performance indicator
- MoJ: Ministry of Justice
- PGSI: Problem-gambling severity index
- Q&A: Questions and answers
- SWOT: (Analysis of) strengths, weaknesses, opportunities and threats
Structure of the report

The report begins with a brief description of the project that was evaluated and an executive summary of the main findings. The report then comprises three main sections:

- **Introduction**, which includes a summary of project background and specification, its description and an overview of the evaluation

- **Key evaluation findings**, presented in three parts:
  - First, we consider the extent to which the proposal submitted by EPIC Risk Management was consistent with the ITT and its specific requirements. We also consider the extent to which the commissioner’s and delivery providers’ expectations for the project were shared and communicated prior to commissioning or in the early stages of the project.
  - Next, we explore project relevance and appropriateness, effectiveness and efficiency and impact and sustainability.
  - Finally, we present a summary-level assessment of the extent to which the aims and objectives and deliverables specified in the proposal, which became part of the delivery provider’s contract with GambleAware, have been achieved.

- **Conclusions**, offering an outline of key lessons learnt and recommendations.

Reporting note

Throughout this report we present percentages rounded to the nearest whole number. This sometimes means that totals can appear to be one or two percentage points out. In charts the text for small percentages (generally less than 3%) is not shown so that the chart can be read more easily.
BRIEF PROJECT OVERVIEW

<table>
<thead>
<tr>
<th>Title</th>
<th>Gambling-Related Harm Minimisation in Criminal Justice</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timing</td>
<td>July 2016 – October 2018</td>
</tr>
<tr>
<td>Budget</td>
<td>£75,000</td>
</tr>
<tr>
<td>Delivery provider</td>
<td>EPIC Risk Management</td>
</tr>
</tbody>
</table>

Partners

HMP Forest Bank acted as a strategic partner in the project, not only by involving large numbers of its staff and prisoners in the training programmes offered through the project, but also by influencing the project design and mediating access to other institutions (CRCs in particular) managed by Sodexo Justice Services.

From November 2017, Beacon Counselling Trust was involved in delivery of treatment services to prisoners in Forest Bank, who had attended the project sessions and requested further intervention.

The Institute of Social Innovation and Impact at the University of Northampton was responsible for analysis and reporting of the evidence that had been gathered by EPIC Risk Management.

Project activity

- Delivery of gambling-related harm awareness-raising sessions to prisoners, probation and prison staff
- Evidence gathering about prevalence of gambling and gambling-related harm, carried out during these awareness-raising sessions
- Informal support to prisoners and individuals released into the community under the supervision of probation and rehabilitation organisations and services
- From autumn 2017 – practical and organisational support to enable free counselling sessions within Forest Bank to take place
The provision of the treatment pathway at HMP Forest Bank was initiated and mediated by GambleAware

| **Target groups** | • Individuals in prisons and other settings and services within the CJS, including those at risk and experiencing gambling-related harm  
• Staff in prisons and other settings and services within the CJS |
| **Delivery locations** | Three prisons in the north west of England and CRCs in locations ranging from Essex in the south to Northumbria in the north of England. |
The Gambling-Related Harm Minimisation in Criminal Justice project, funded by GambleAware (formerly the Responsible Gambling Trust), was delivered by EPIC Risk Management between July 2016 and October 2018.

The main project activity comprised delivery of gambling-related harm awareness-raising sessions to prisoners, probation and prison staff. During the sessions, data gathering activities also took place to improve understanding of gambling-related harm in the sector. In addition, informal support was offered to prisoners and other convicted individuals experiencing gambling-related harm. After a free treatment pathway (counselling services) was implemented in Forest Bank to support prisoners affected by problem gambling, the delivery team also offered practical and organisational support to enable counselling sessions to take place.

According to final project report prepared by the University of Northampton and drawing on the evidence collected by the delivery provider, over the course of the project:

- EPIC Risk Management worked with three prisons (HMPs Forest Bank, Wymott and Kirkham) and 15 CRCs to deliver the project activities.
- Training programmes were delivered to 620 convicted individuals, the vast majority of them prisoners, and 409 prison staff.
- Through their partnership working and personal experiences, the delivery team had a good understanding of the criminal justice system, and the needs of their key target groups.
- The majority of the project sessions were well received. For example, for prisoner training, the average session rating, reflecting participants’ thoughts about how useful they found the sessions they attended, was 9 out of 10 (Base=587).
- Despite educational and training session delivery being a key project activity, no data about the outcomes for people who attended such sessions was collected by the delivery provider. Yet, this lack of evidence does not mean that there no positive outcomes for the training participants. On the contrary, all primary evidence gathered for the purposes of this evaluation suggests that people who attended the training delivered by EPIC Risk Management gained in their awareness of gambling-related harm and how this can be prevented and minimised.
• Some impressive outcomes have been achieved for a number of prisoners, who were involved in and accessed support through the project in order to minimise the level of harm they were experiencing due to their problem-gambling and to help them control their gambling behaviour.

• Evidence gathered by the delivery provider suggests that involvement in gambling activity and prevalence of problem gambling in the criminal justice system might be higher than is average for British society. For example, 11.9 per cent of prisoners involved in the training sessions delivered as part of the project (Base = 620), requested and received treatment for problem gambling. In an earlier study carried out as part of the project set-up, 18 per cent of respondents stated that they ‘have had a gambling problem in the last 12 months either in or out of custody’ (Base 550).

• Lack of clarity about the project expectations, particularly with regards to the project reach and strategic working, aims and objectives, including intended outcomes and how these can be achieved, had negative effects on the project delivery and limited its impact.

• There were serious limitations and weaknesses in the delivery provider’s approach to evaluation and evidence collection.

**Recommendations**

GambleAware should:

• Ensure its requirements and expectations for any work being commissioned are fully clear and transparent. This is particularly important for projects the aims and implementation of which are expected to comprise strategic as well as direct delivery work. In practice, strategic work often slips in favour of more straight-forward to plan, deliver and monitor direct delivery work. Therefore, strategic work often needs greater attention and prioritisation and this might need to be modelled by the commissioner. If clear guidance about expectations cannot be offered within a project specification, it should be achieved prior to the beginning of the project. If requirements, expectations or priorities (including regarding the balance of the project activities) change or get refined during the project implementation, they should be clearly and formally communicated to and agreed with the delivery provider.

• Ensure that there is evidence of clearly defined project outcomes, short and longer term, at individual, organisation and if appropriate system or sector levels, as well as ways of achieving and monitoring them, prior to any work commencing.

• Where funding is awarded to projects involving multiple parties and relies on partnership-working, roles and contributions of all parties need to be clearly defined.
EPIC Risk Management should:

- Consider developing internal expertise to ensure good understanding of project inputs, processes, outcomes and inputs.

- Systematically capture immediate/short-term outcomes for all target groups of people involved in its projects. Where relevant, EPIC should also try and gather evidence about longer-term impact for project participants, particularly those who are involved in more intensive and/or extended delivery activities, as well as collecting evidence about organisational changes and developments within the settings that it supports.

- Systematically gather feedback from training participants, service users and other beneficiaries, related to effectiveness of processes and how these can be improved, as well as evidence of outcomes. This information should be used for continual improvement and development as well as reporting purposes and to secure future funding.

- Draw on external expertise, or invest in developing internal expertise, so that any future delivery activities have a clear logical framework underpinning them, are outcomes-focused and that appropriate data capture processes (including ensuring informed consent and adhering to data protection regulations) and instruments are in place.
1 INTRODUCTION

1.1 Background to the project and its specification

GambleAware (formerly the Responsible Gambling Trust) is an independent charity that commissions and funds research, prevention and treatment services to help reduce gambling-related harm in Great Britain. It works in partnership with the Responsible Gambling Strategy Board and the Gambling Commission.

In 2015, GambleAware invited applications for funding, as part of its two-year Harm Minimisation programme. The aim of the programme was to ‘develop evidenced approaches to reduce the impact of gambling-related harm, particularly on vulnerable populations such as young people’ (Harm Minimisation ITT). It was positioned within Tier 1 of the charity’s commissioning framework, meaning that any project work was expected to be delivered within non-problem gambling specific services and include interventions such as screening, brief intervention, referral and self-help provision. According to the ITT, GambleAware was looking for educational, sign-posting and other harm-minimisation approaches that would be evidence-based, target population groups that might be at particular risk and be practical in their delivery approaches and have a national focus or some clear potential for national roll-out.

One of the projects that was commissioned as a result of the tendering process was delivered in the UK Criminal Justice System by EPIC Risk Management.

1.2 Description of the project as outlined in the proposal

1.2.1 The problem that the project was trying to address

The project proposal outlined the following issues in its analysis of the context and need for the proposed project:

- The rates of problem gambling amongst prisoners are higher than the general population
- Factors such as stress, peer pressure and boredom, affecting convicted individuals during their time in the CJS, can become triggers to relapse and intensify difficulties in controlling gambling behaviour
• The nature and levels of gambling-related harm experienced by convicted individuals may be more profound compared to the general population and include, in addition to the common types of harm such as relationship breakdown or financial difficulties, greater instances of violence, bullying, assault and suicide

• Some offences and reoffending are directly gambling-related

• Gambling can and often does remain a hidden addiction within the CJS because no appropriate screening is in place.

### 1.2.2 Project aims and objectives

The project proposal did not explicitly specify the aims of the project but did state that it would ‘provide a truly ground-breaking and transformational programme within the criminal justice sector that ... will be scalable to the full justice estate and will improve and save lives’.

11 objectives were included in the proposal. The majority of them related to the project set-up, delivery, monitoring and dissemination activities, i.e. were to do with the project implementation rather than what it wanted to achieve.

Three objectives offered some clarification about the intentions of the programme and support package to be delivered:

- Provide education and awareness to members of the criminal justice system on gambling-related harm

- Create and communicate an established intervention pathway in conjunction with existing CJS offering ...

- Increase ability of leaders... to recognise symptoms and understand how to help in order to minimise gambling-related harm.

In addition, there were two objectives related to data and evidence capture during awareness-raising and training sessions, in order to improve understanding of gambling-related harm and to facilitate an evidence-based approach to reducing it in the CJS.

The full list of the project objectives, along with the analysis of the extent to which they have been achieved, is presented in section 2.3 of the current report.

### 1.2.3 The project approach, key activities and deliverables

In the project proposal, EPIC Risk Management outlined a five-phase approach to delivering the project:
Phase 1 – Work with service users in prisons and the community
Phase 2 – Train prison officers
Phase 3 – Work with families of convicted individuals
Phase 4 – Train probation officers
Phase 5 – Present to all Tier 1 providers and the Ministry of Justice.

As can be seen from the list above, the first four ‘phases’ in fact referred to working with different target groups; there was no expectation that this work would be phased. Therefore, and this is consistent with the delivery timetable included in the proposal, the main phases of the project might be better summed up as follows, with the key one highlighted in bold:

- Set up
- Training and support delivery and data gathering
- Data analysis
- Dissemination and scaling up.

Only a minimal amount of detail was provided about the nature of the activities to be delivered. It was anticipated that work with prisoners would be carried out in small groups and one-to-ones, and that sessions with family members will be held in the ‘prison visits environment’ and possibly also in probation settings. The proposal stated that data and feedback would be captured using electronic hand-held devices during sessions with all the target groups involved in the project.

In its description of the final phase of the project, the proposal included a statement that in order to reduce gambling-related harm in the CJS, it was important for gambling to be added to:

- Induction and sentence planning procedures in criminal justice settings
- Risk management sections of Tier 1 contracts.

For this reason, presenting the project evidence to the MoJ and Tier 1 contracts was viewed as a route to rolling out the project nationally. However, no specific and concrete connections between the project and the above-mentioned two system-level changes were made explicit in the project proposal. For example, there was no detail regarding what specific data needed to be captured in order to persuade the MoJ and Tier contract holders to change their existing systems.

1 Tier 1 providers are private companies or other organisations and their collaborations that hold direct contracts with the Ministry of Justice for delivering prison or probation services. Examples of these include Serco and C4S Justice Services, as well as Sodexo Justice Services which was involved in the project.
The proposal did not define expected outcomes for any of the target groups. There was no logical framework, theory of change or similar framework, which would have linked the project activities to the desired outcomes.

No deliverables or project outputs, related to for example, expected numbers of sessions to be delivered or people trained or supported, were stated in the proposal.

### 1.2.4 Expected project reach

The proposal stated that ‘all initial work [would] be piloted at HMP Forest Bank in Salford.’ From this statement, the evaluation team was unable to unequivocally conclude whether such ‘initial work’ referred to piloting prior to delivery of the project activities (set up activities, before Phase 1) or the entire project, i.e. all activities carried out prior to dissemination at a national level (Phase 5 and post-project aspirations).

Beyond HMP Forest Bank, all other plans related to the project reach were expressed tentatively. Specifically, the proposal indicated that there was ‘scope to further the work’ to the other four Sodexo prisons:

- HMP Peterborough
- HMP Bronzefield
- HMP Northumberland
- HMP Addiewell.

As for the project’s delivery activities in the probation and rehabilitation sector, it was anticipated that it would be carried out with Sodexo’s Cumbria and Lancashire CRC and Purple Futures’ Greater Manchester CRC\(^2\), ‘with the scope to further the work’ to Sodexo’s other CRC.

### 1.2.5 Project timings

The proposal suggested that the project would be delivered between May 2016 and April 2018. The project timings were adjusted in the contract, to take account of the commissioning phase. According to the contract, the Gambling-Related Harm Minimisation in the CJS project was due to commence in July 2016 and end in July 2018, with all training delivery being completed by January 2018.

\(^2\) https://www.interserve.com/purple-futures
1.3 Project evaluation

1.3.1 The project evaluation and its aims

GambleAware commissioned Chrysalis Research to carry out an independent evaluation of the project, examining its processes and outcomes. The evaluation data collection and analysis activities were carried out between July and December 2018.

The aims of the external evaluation were to:

- Assess the relevance, appropriateness, effectiveness, efficiency, impact and sustainability of the project, its activities and interventions
- Identify key lessons learned
- Provide evidence-based recommendations moving forward.

1.3.2 Methods and evidence base for this report

Prior to the beginning of the main evaluation data collection and analysis activities, the evaluation team:

- Carried out scoping activities, which included initial interviews with the delivery provider and analysis of some of the key project documents
- Discussed the evaluation and expectations for it with GambleAware. To clarify the latter and ensure the evaluation was focused and comprehensive, a series of research questions was agreed to enable the evaluation team to assess relevance, appropriateness, effectiveness, efficiency, impact and sustainability of the project and its activities. The research questions are provided in Appendix 1.

To achieve the evaluation aims stated above, Chrysalis Research carried out a review of all the data collected by the delivery provider and other project documents and evidence, as well as some primary data collection.

Review of the evidence collected by the delivery provider and generated as part of the project (secondary evidence)

Evidence and data gathered and shared by the delivery provider and its project partners was one of the key sources of evidence for this report. Such evidence included project proposal and contract documents, progress and final reports, and raw data gathered by the delivery provider. Further detail about the documents and evidence reviewed by the evaluation team is provided in Appendix 2.
Primary evidence gathered by the evaluation team

The evaluation team also carried out some primary data collection activities which included depth interviews with:

- The project team
- The commissioner (GambleAware)
- Nine representatives from the partner organisations involved in the project:
  - HM Forest Bank – four senior and two frontline staff, six colleagues in total
  - Beacon Counselling Trust – a senior colleague and the counsellor involved in working with prisoners at HM Forest Bank alongside the delivery provider
  - University of Northampton – the lead researcher involved in the project
- Two people involved in training for staff in probation roles, representing different CRCs.
- Three Forest Bank prisoners who were supported through the programme.

In addition, the delivery provider captured feedback from 13 prisoners, using the short post-training session feedback forms which was designed by the evaluator.

1.3.3 Evaluation challenges and limitations

The evaluation team encountered the following challenges which negatively impacted on its ability to perform a comprehensive assessment of the project relevance, appropriate, effectiveness, efficiency, impact and sustainability.

First of all, the *project aims, outcomes and outputs were not defined in the proposal or at any other stage of the project*. This made it very challenging to assess the extent to which the project delivery was consistent with expectations and commitments stated in the contract, as these were not specified.

Secondly, there were some serious issues with the data captured by the delivery provider:

- *Data was not collected for all population groups* identified as target for this project. Specifically, no evidence was captured for:
  - Staff at Forest Bank and other prisons who were involved in workforce training activities delivered as part of the project (referred to in the proposal as Phase 2 of the project approach, see section 1.2.3)
  - Family members of convicted individuals (referred to in the proposal as Phase 3 of the project approach)
Where evidence was collected, there were instances when

- Raw datasets, related to training of probation officers, were not available for the evaluation team’s scrutiny. Instead, only a summary of participants’ responses was provided.

- No outcomes or processes data was systematically captured by the delivery provider, mainly due to the lack of relevant evaluation and monitoring expertise within the delivery provider organisation as well as some other factors explored in detail in later sections of this report.

- There were errors, inaccuracies and inconsistencies in the dataset containing evidence of prisoners’ and other convicted individuals’ involvement in the project.

Specific to the latter point, there were instances when prisoners’ responses captured via paper feedback forms\(^3\) did not match records in the electronic dataset, suggesting data entry errors\(^4\). During data entry, no differentiation was made between prisoners not completing the PGSI form which was included as part of data capture\(^5\) and them responding negatively to all its questions; in both instances their PGSI score appear to have been recorded as ‘0’. Similarly, there were no entries in the electronic dataset indicating that participants opted out of providing a rating for the session they attended, yet there were such instances in the actual – paper – feedback forms. Where prisoners provided handwritten comments about the sessions they attended and what they gained from them, such comments were not captured in the electronic dataset. Finally, we know from the interviews with prison staff and convicted individuals as well as interviews with the delivery provider that some prisoners attended more than one training session (essentially repeating their training one or multiple times). Yet, according to the data provided in the prisoner project database, it is not possible to identify how many unique individuals attended the awareness-raising sessions aimed at convicted individuals and distinguishing them from people attending the same session multiple times.

There were also some discrepancies between the dataset containing evidence of prisoners’ involvement in the project and other documents examined by the evaluation team. For example, one of the steering group meeting notes documents states that the programme sessions were due

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\(^3\) The evaluation team was able to examine a randomly selected sample of scanned copies of paper-based feedback forms

\(^4\) For example, there were several instances where a combination of responses, such as the session date, the participant’s session rating and their PGSI score noted by the evaluation team in the copies of feedback forms did not have a matching record in the electronic database, i.e. the raw dataset which was provided to the University of Northampton and to Chrysalis Research to draw conclusions about the reach and outcomes of the project.

\(^5\) Within the sample of feedback forms examined by the evaluation team, there were multiple instances of PGSI forms left blank by prisoners providing their feedback.
to start after February 2017, yet there are more 60 records of prisoners who attended training sessions in 2016 within the dataset shared by the delivery provider.

The evaluation team also experienced the following challenges that we feel are important to highlight:

- Despite the delivery provider’s reported multiple attempts to organise a visit to Forest Bank for the evaluation team, it was not possible to arrange this. Instead, phone rather than face-to-face interviews were carried out with a range of stakeholders. We were, however, unable to
  - Observe any delivery, or
  - Select respondents and administer data collection questionnaires ourselves, ensuring there was no bias.
  
  As it stands, we are unable to say that we have spoken to a range of prisoners and other convicted individuals who had attended the training sessions delivered as part of the project. Conversely, the interviews with prisoners that were arranged for us were with the same individuals, whose experiences have been used as case studies in the project reporting. It was clear that the same prisoners, viewed – justifiably so – as success stories by the project team were asked to provide feedback multiple times and in different forms. It is important to note that this point about a degree of bias in primary data collection is specific to this target group (prisoners) only.

- We gathered feedback from fewer institutions, other than HM Forest Bank, involved in the project, that we had hoped. We were also unable to speak to other Sodexo prisons which had decided not to take part in the project.
2 KEY EVALUATION FINDINGS

In this section we offer our analysis of the extent to which the proposal submitted by EPIC Risk Management was consistent with the ITT and its specific requirements. We also consider some additional expectations for this project, which could have been discussed during the commissioning stage and made part of its delivery. The aim of offering these two pieces of analysis of the pre-project phase is to identify learning points for both the commissioner and the delivery provider, rather than to provide an assessment of the project.

For evaluation proposes, a project should be assessed against its contract and not the specification. The evaluation team’s analysis of the extent to which the project achieved its aims and commitments outlined in the contract is included in sections 2.2 and 2.3.

2.1 Consistency of the project proposal with the ITT and its specific requirements

Our analysis of the ITT and the project proposal revealed that there were a number of areas where the latter was not fully consistent with the commissioner’s requirements. Some of shortcomings and limitations of the proposal have already been highlighted in the introduction.

Here (Table 1), we present a systematic overview of our analysis of the proposal against the specification.

<table>
<thead>
<tr>
<th>Requirement/expectation stated in the ITT</th>
<th>Provided or not in the proposal</th>
<th>Summary judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>An outline of the delivery organisation’s previous experience</td>
<td>A clear description is provided.</td>
<td></td>
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<tr>
<td>Candid assessment of the strengths and weaknesses of the proposed approach</td>
<td>An analysis of strengths and weaknesses is provided in Appendix A of the proposal.</td>
<td></td>
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<tr>
<td>Evidence of an assessment of need, and how the work will address this</td>
<td>Section D offers a good range of evidence and insight related to gambling-related harm in the CJS. It does,</td>
<td></td>
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<tr>
<td>Requirement/expectation stated in the ITT</td>
<td>Provided or not in the proposal</td>
<td>Summary judgement</td>
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<tr>
<td>however, lack clarity about issues and needs at different levels – individual (different types of stakeholders, most notably convicted individuals and workforce) and organisational, for different types of settings. There is no alignment between the section outlining issues related to gambling in the CJS and the description of activities aimed at various target groups, presented later on section D of the proposal.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evidence of appropriate targeting to achieve maximum impact</td>
<td>Evidence of targeting is visible in the proposal, including differentiation between convicted individuals, their families, and frontline staff in different types of settings within the CJS.</td>
<td></td>
</tr>
<tr>
<td>Clear aims and objectives</td>
<td>Goals and/or aims are not stated, despite references to these being made in the proposal. Objectives are provided but they use vague terminology, lack consistency and do not cover some aspects of the delivery approach whilst duplicating coverage of others. There is a degree of confusion between outlining how the objectives will be achieved (strategies and mechanisms) and how success will be assessed (indicators of progress and performance).</td>
<td></td>
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<tr>
<td>Appropriate outputs and outcomes explicitly identified</td>
<td>None identified.</td>
<td></td>
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<tr>
<td>Explanation of how outputs and outcomes would be measured, monitored and used in project review and development</td>
<td>There are references to capturing data for measuring and monitoring purposes, but no detail is provided. With no outcomes or outputs specified, ways of measuring them are also absent in the proposal. Note: an absence of a clear measurement approach was highlighted by EPIC in the ‘Weaknesses’ part of the SWOT Analysis section of the proposal.</td>
<td></td>
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<tr>
<td>Service user input throughout the life cycle of the project</td>
<td>The proposal contains multiple references that the delivery provider would ‘work directly with service</td>
<td></td>
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<tr>
<td>Requirement/expectation stated in the ITT</td>
<td>Provided or not in the proposal</td>
<td>Summary judgement</td>
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<tr>
<td>users in prisons and the community’, however this mainly refers to delivery as opposed to seeking service user inputs to inform delivery and project implementation. At the same time, the document refers to a) focus groups with prison staff, probation officers and prisoners to gain insight and inform delivery 2) working with partners in strategic roles within HMP Forest Bank to draw on their expertise and understanding of the issues and context within which the project would be delivered. The proposal also states that feedback data would be captured during sessions.</td>
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<td></td>
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<tr>
<td>Transparent monitoring, evaluation and review</td>
<td>The proposal mentions bi-monthly steering group meetings as a key monitoring and review mechanism. Its role appears comprehensive, but some aspects of the description (e.g. reviewing project progress against the project goals, which have not been identified – see above) pose questions when closely scrutinised. The description of the role of the University of Northampton, named as the research partner, is contradictory in different sections of the proposal and ranges from clearly defined (‘will monitor and assess’, ‘deliver’) to very tentative, indicating a lack of prior formal agreement on the university’s part to be involved and in what exact role. References to peer-review of evidence and compliance with ‘EU Commission standards of research and impact reporting of the data’ are made in the proposal, but no detail is given and so the meaning behind them is unclear.</td>
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<tr>
<td>Requirement/expectation stated in the ITT</td>
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<td>Summary judgement</td>
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<tr>
<td>Dissemination of findings</td>
<td>Dissemination is mentioned in several sections of the proposal, including the project timeline but no detail beyond sharing the intention of sharing data gathered as part of the project with the MOJ and Tier 1 providers is included.</td>
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<tr>
<td>Sustainability of the work after funding ceases</td>
<td>References to sustainability are made but there is no evidence to suggest that planning for this was carried out at the project design stage. Instead, the proposal contains several assertions such as that sustainability will be achieved by demonstrating the value of the project, or that if the programme is effective then (problem) gambling would become one of the risks that Tier 1 contract holders are required to monitor.</td>
<td></td>
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<tr>
<td>How the work improves understanding of gambling-related harm and its impact</td>
<td>Capturing data aimed at improving understanding of gambling-related harm in the CJS is stated as one of the objectives. References to data capture during awareness-raising sessions involving servicemen and women are made throughout the proposal.</td>
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</tbody>
</table>

In addition to the above, the evaluation team also feels it important to highlight that:

- There were instances of errors in the proposal (such as sections\(^6\) being repeated in multiple places and instances of sections from another proposal and references\(^7\) to another project being present).

- The proposal can be seen as misleading about the delivery provider’s partners in the CJS. Multiple references to Sodexo Justice Services are made in the proposal and the company logo is used throughout. Yet, the named individuals within the project team and any commitments within the proposal related to the project reach explicitly refer to only one establishment managed by Sodexo Justice Services – HMP Forest Bank. This suggests that no

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\(^6\) For example, the same SWAT analysis is included on pages 20 and 30.

\(^7\) E.g. ‘our military partners’, ‘chain of command’, ‘Is gambling a problem in your unit/the armed forces?’
formal agreement to be involved in the project had been secured from Sodexo Justice Services at the proposal stage and references to it as a project partner are inaccurate.

This analysis presented above does not fully acknowledge the strengths of the proposal submitted by EPIC Risk Management and its partners, which were the reasons why grant-funding was awarded to the project. Our analysis shows that despite its strengths and advantages over competitors, the proposal submitted by EPIC Risk Management was not without serious limitations.

In future commissioning, GambleAware needs to make sure it performs a careful assessment of successful proposals and requires any significant shortcomings to be addressed by delivery providers prior to the beginning of the work or as soon as possible thereafter.

### 2.1.1 Additional expectations of the project

Interviews with the commissioner indicate that as well as the programme aims outlined in the ITT, there were some additional expectations of and aspirations for this project. The commissioner anticipated that the bulk of the project delivery would be focused on the workforce, frontline staff working in prisons and probation settings, rather than prisoners and convicted individuals directly, particularly those who are problem gamblers. At the end of the project, GambleAware wanted to see some tested and scalable models of delivery that educate and empower staff in settings within the CJS and enable them to identify and tackle gambling-related harm, whilst also developing organisational capacity within participating establishments and ultimately ensuring high levels of reach and system penetration. It is not possible to say the extent to which these ambitions were communicated to and understood by the delivery provider as there were no written records documenting them.

In turn, the delivery provider was expecting more hands-on engagement from the commissioner, through for example higher number of observations of training sessions and discussions about the national roll-out of the project. Similar to the above, our evidence suggests that these expectations were not communicated to or discussed with the other party, leading to a degree of dissatisfaction which could have been avoided.

Perhaps even more importantly, a lack of effective communications about expectations for the project may have resulted in missing opportunities for it to achieve greater levels of impact.

Making sure that any additional expectations of the project and/or its delivery provider are clearly communicated, and similar feedback is sought from the other party, is an important learning point from this project.
2.2 Detailed analysis of the project: Relevance and appropriateness, effectiveness and efficiency, and impact and sustainability

2.2.1 Project relevance and appropriateness

In this section we consider the extent to which the project design and its activities were consistent with the needs of target groups of the population and the project aims outlined in the ITT, were informed by working with partners and underpinned by a clear logical framework, connecting activities to outcomes.

2.2.1.1 Consistency of the project activities with the needs and priorities of the target group and all relevant stakeholders

Through their partnership working and personal experiences, the delivery team had a fairly good understanding of the criminal justice system, and the needs of their key target groups. Issues affecting convicted individuals as they were outlined in the proposal were presented earlier in this report. The needs of staff CJS settings’ staff, prison officers in particular, were articulated by senior stakeholders from the partner organisations. They related not only to developing prison officers’ awareness of gambling-related harm to improve their professional capacity to support convicted individuals but also notice and mitigate risks related to gambling from a personal point of view.

> With being in a high-pressured role, [prison officers] could be more vulnerable to getting involved in it [gambling]. If they get themselves into a bit of debt with gambling, then they might cross the line in terms of bringing contraband into a prison to make money.

Senior member of staff at HMP Forest Bank

Some additional insight gathering activities were also carried out in the early stages of the project, but they appeared to be more focused on scoping perceptions about whether gambling is a problem in the CJS than deepening understanding of the needs of each of the target groups.

2.2.1.2 Alignment of the project activities with the objectives stated in the ITT and expectations for the project

The ITT did not define objectives for the projects commissioned within the Gambling-Related Harm Minimisation programme, stating only the overarching aim for the latter: ‘to develop evidence-based approaches to reduce the impact of gambling-related harm, particularly on vulnerable populations’.
Our analysis of the project documents and interview data all suggest that the delivery provider’s chosen approach was broadly consistent with GambleAware’s expectations for the programme, stated in the ITT, in terms of the choice of content, target groups and types of the activities being delivered.

As was already mentioned in section 2.1, with regards to this particular project, GambleAware’s expectation was that workforce development activities would be considerably more prominent, compared to delivery of training and support activities to convicted individuals, however this was not formally articulated in the project specification or during the project implementation.

2.2.1.3 Absence of a clear outcomes or other logical framework underpinning the project

Given the lack of clarity about the project aims and intended outcomes for each of the target groups, it is perhaps unsurprising that ways of achieving them were also unclear. There was no clear logical thread between what was done and what was achieved as a result. Where this was perhaps most noticeable was in the distribution of the project resource and the degree of prioritisation given to specific activities. EPIC Risk Management gave high priority to working with prisoners (direct delivery) as opposed to strategic working, which does not align with the delivery provider’s ambition to ultimately achieve system and sector-level change.

2.2.2 Effectiveness and efficiency

In this section, we explore the extent to which project activities were carried out according to plan, and whether the interventions and delivery mechanisms were effective and efficient.

2.2.2.1 Completion of activities in accordance with the project plan

As already highlighted in this report, the project proposal and its contract did not define specific outputs or KPIs. Even when reach of services was indicated, it was framed tentatively – as possible and intended, rather than as firm commitments. Partly at least, this was because the project was delivered in the new sector so defining expectations in a realistic and accurate manner was challenging. This does mean however that a detailed review of the project activities and achievements against the plan is not possible, due to the latter being open for interpretation.

Nonetheless, our analysis enables us to make some high-level observations, firstly about the project reach, and then about the alignment of all its activities with the commitments stated in the proposal and the project contract.
Project outputs and reach

According to final project report prepared by the University of Northampton:

- EPIC Risk Management worked with three prisons (HMPs Forest Bank, Wymott and Kirkham) and 15 CRCs to deliver the project activities. We were unable to validate the latter (the number of CRCs whose staff had been trained) as no attendance records or other data was shared with us by the delivery provider to confirm this. We were also unable to identify the numbers of probation officers involved in the project. One of the documents shared with us states that 108 probation officers from four Sodexo CRCs attended training delivered by the project team. We have no further information related to numbers of people or organisations involved in probation staff training.

- Training programmes were delivered to
  - 620 convicted individuals, the vast majority of them prisoners (This figure is broadly consistent with the raw data that was shared with the evaluator8, however it is important to highlight again that the dataset did not distinguish between unique participants and instances of attendance, meaning that some participants would have been counted two or more times if they attended the same session more than once, which is relatively common in the prison environment. At the same time, it is important to highlight that some prisoners received multiple instances of training and support, although this again cannot be quantified or described due to lack of data.)
  - 409 prison staff (The evaluation team has no evidence to validate this figure quoted in the final project report prepared by Northampton University and in the interim report submitted by the delivery provider).

Project activities

There was no single definitive list of the project activities and other commitments in the project contract, which is why in the analysis below, we draw on its multiple sections to list commitments9.

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8 Please note that the number of entries in different versions of the ‘prison register’ datasets shared with the evaluator by the delivery provider and their research partner ranged from 602 to 635. None of these were identical to the figures presented in the final project report (677 prisoners involved in the training, for 620 of which data was available).

9 These include the description of the approach (Project Detail) provided in section D and project budget (including deliverables listed in the table outlining project expenditure) and timeline, both presented in section C.
Table 2 Assessment of the implemented activities against the project plan

<table>
<thead>
<tr>
<th>Activity</th>
<th>Status</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steering group set up and initial meeting to confirm roles and accountability</td>
<td></td>
<td>There were multiple meetings with a range of senior staff at Forest Bank at the project set-up stage, some of which covered roles and accountability but the level of detail and specificity with which this was discussed is unknown. The University of Northampton, which is listed in the project proposal/contract as being represented in the steering group, was not involved in this aspect of the project.</td>
</tr>
<tr>
<td>Plan training programmes</td>
<td></td>
<td>Training format and materials were developed using delivery provider’s pre-existing delivery approach and materials, and were adapted for the project by drawing on feedback from senior stakeholders from HMP Forest Bank in the early stages of the project. GambleAware was not involved in development or sign-off. There is no evidence to suggest that there were multiple training programmes, addressing the specific needs of target groups in different ways.</td>
</tr>
<tr>
<td>Development of data collection tools</td>
<td></td>
<td>Questions and tools to be used in data capture were developed by the delivery provider. They were not checked or signed off by the research partner or GambleAware. As a result, data capture did not cover all project activities and the data that was collected was limited in its scope and quality. Consequently, project objective 1 was not achieved.</td>
</tr>
<tr>
<td>Training and data collection</td>
<td></td>
<td>Sessions to three out the four target groups listed in the proposal were delivered as part of the project. The evaluation team has no evidence that sessions with family members of convicted individuals have taken place. Data capture during sessions with all four target groups was anticipated to be done by using OMBEA hand-held devices. For security reasons and compliance with internal procedures in prisons, it was not possible to use these devices during sessions with prisoners. There is no evidence that the devices were used with prison officers either, the reasons behind which are unknown. Evidence gathering though OMBEA during</td>
</tr>
</tbody>
</table>
### Activity Status Commentary

<table>
<thead>
<tr>
<th>Activity</th>
<th>Status</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>sessions with probation officers</td>
<td></td>
<td>appears to have been inconsistent and taken place during only some of the sessions.</td>
</tr>
<tr>
<td>Some data was captured during sessions with prisoners; very small amount of evidence was gathered about prison and probation officer training. No evidence related to families of convicted individuals and their involvement in the project was captured by the delivery provider.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data analysis and reporting</td>
<td></td>
<td>Data, limitations of which have already been noted in this report, was collected by EPIC and then reviewed and reported by the University of Northampton, as per the project proposal.</td>
</tr>
<tr>
<td>Dissemination</td>
<td></td>
<td>Dissemination was mentioned in the description of the proposal, but no details about how to implement it were provided. No resource was allocated to dissemination. The evaluation team is unaware of any dissemination activities that have taken place.</td>
</tr>
<tr>
<td>Phase 5 MoJ/Tier 1 presentation and national roll-out</td>
<td></td>
<td>The presentation did not take place during the lifetime of the project, although the evaluation team was aware of the delivery provider’s attempts to arrange it after the project was completed.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No detail about any national roll-out activities was provided in the proposal/contract and no resource was allocated to this activity. It was anticipated that the presentation would lead to (problem) gambling becoming a risk that Tier 1 providers would need to monitor in their activity and that this in turn ‘will allow the national roll-out of phases 1-4’ (i.e. the delivery of education and training sessions to convicted individuals, their families, prison and probation officers).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>There was no evidence of upscale or national roll-out by the time the evaluation data collection was completed.</td>
</tr>
<tr>
<td>Steering group meetings and progress monitoring</td>
<td></td>
<td>According to the project proposal and contract, steering group meetings were due to take place bi-monthly, involving multiple senior stakeholders from HMP Forest Bank, as well as the delivery provider’s team, and Northampton University. The meetings were due to be formally minuted.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The available documentary evidence suggests that a small number of steering group meetings took place in the earlier part of the project.</td>
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</tbody>
</table>
Activity Status Commentary

(e.g. we reviewed notes dated November 2016 and January 2017). There was no evidence of steering group meetings taking place in the later stages of the project. There were also no alternative, perhaps less formal, mechanisms for monitoring the project and ensuring partner involvement in the process. Some of the evidence that was captured by the evaluator suggests that communications between the delivery provider and several senior stakeholders at HMP Forest Bank, as its key strategic partner in the CJS, in the later stages of the project were ineffective. This was visible for example when specific points related to session delivery and project development identified by senior stakeholders at Forest Bank were not discussed with the delivery provider and as a result not addressed.

Feedback and exception reporting

During the course of the project, one formal project progress report and an interim report were sent to GambleAware. No project steering group meeting notes were shared with GambleAware, even after they had been requested.

Overall, the project was delivered in line with what was described in the proposal, with the delivery of awareness-raising and training sessions to convicted individuals, prison staff and probation offers being the key activity. There were, however, also some noticeable discrepancies between what was outlined in the proposal and what was delivered.

We offer additional information and analysis for four such areas:

- Additional activity with convicted individuals in Forest Bank who requested further support
- Project delivery timings
- Evidence gathering, research and evaluation
- Control mechanisms.

Additional activity with convicted individuals in Forest Bank who requested further support

According to the interviews carried out by the evaluation team, in addition to small-group educational sessions delivered by EPIC Risk Management to prisoners, members of the project team also offered ongoing support to some prisoners. This took form of, usually brief, informal conversations with individuals, checking how they were in general and if they had any concerns.
related to gambling. We were unable to clearly identify who such support was offered to (in accordance with which criteria), how much and how often and what exactly was involved.

The delivery provider’s staff also supported the delivery of counselling services to prisoners in Forest Bank. In 2017, GambleAware arranged for Beacon Counselling Trust to deliver free counselling sessions to prisoners in Forest Bank as the commissioner felt it was important to ensure there is an intervention pathways to those prisoners who request support to help them better control their gambling behaviour and to minimise gambling-related harm, after attending the project sessions. Members of staff from EPIC Risk management dealt with the logistics of making sure that prisoners undergoing counselling attended their sessions by bringing them from their cells to the sessions. Stakeholder views about the extent to which this was necessary for the counselling to happen in Forest Bank and whether the way it was set up by the delivery provider was efficient, differed considerably.

- According to the treatment provider, EPIC’s role in making each of the counselling sessions take place was invaluable. The treatment provider highlighted that their work in other settings within the CJS had stalled because support such as that offered by EPIC in Forest Bank, was not available. Staff from Beacon Counselling Trust spoke about prison staff generally having no capacity to support such additional services and it not being possible for their counsellors, who were not vetted or gone through specialist induction procedures in order to for example have keys and access various areas within prisons, and many of whom were females in male prisons, to hold their sessions with prisoners without additional support in organising them.

- Some senior stakeholders from HMP Forest Bank disagreed with this view. They felt that the way the sessions were organised and supported by EPIC created a situation where there was an unnecessary dependency on the delivery provider. Instead, the partner organisation would have preferred a more strategic approach, where internal capacity to organise and support counselling sessions was identified and developed.

Timings

The delivery of the training sessions and support to prisoners was completed in August-September rather than January 2018, as per the project contract. The final project report was submitted to GambleAware in October 2018, as opposed to July 2018. It is unclear whether this was discussed with and approved by the commissioner.
Evidence gathering, research and evaluation

In the proposal, the delivery provider recognised that evidence and data gathering were important to achieve the project aims and objectives. To ensure this was done well, EPIC Risk Management secured support from a research partner.

According to the proposal, the research partner was due to be involved throughout the project. In reality, the research partner was only involved in the final stages of the project. A contract between the delivery provider and the research partner was put in place a year after the project commenced. Within it, the research partner’s role was limited to data analysis and reporting. The reasons behind this are not fully clear. There is evidence to suggest that EPIC Risk Management prioritised session delivery in the early stages of the project over the set-up of robust data collection processes. It is also likely that the delivery provider underestimated the level of expertise required to carry out evidence collection that produces high-quality, generalisable data. It is equally possible that the research partner was unable to give the project the attention it needed in the early stages, as only a very small amount of resource was allocated to research and evaluation support (four days of researcher time in total).

Not involving a research partner from the beginning, paired with limited levels of internal expertise in the area of monitoring and evaluation, had serious negative effects on the project and its outcomes, as data gathered by the delivery provider did not cover all aspects of the project delivery and was of limited quality. In addition, ethics (participants’ informed consent) and data protection issues related to data capture were not given due consideration, although some of these were rectified later on.

Feedback on the data being captured by the delivery provider and related processes, with recommendations for how this could be rectified, was provided by the research partner in January-February 2018, but by that point a large volume of delivery activities had already been completed, so only procedural (how the data was captured and stored and insuring records do not contain private details such names of individuals) rather than substantial (what data is being captured) changes were possible to implement.

Both the delivery provider and GambleAware need to make sure that measures are taken to prevent similar situations happening in future delivery.

Control mechanisms

Eligibility criteria in the ITT stated that ‘the project must ... have some formal structure, for example a management committee or steering group (documentary evidence will be required)’.
In response to this, the delivery provider stated in their proposal – which became part of the project contract – that a steering group comprising three representatives from EPIC Risk Management, an identical number of senior stakeholders within HMP Forest Bank and the research partner, would meet on a bi-monthly basis and that the meeting notes would be shared with the commissioner.

Whilst some steering meetings did happen, these mainly took place in the early stages of the project. The available evidence suggests that having formal control and monitoring mechanisms, involving all partners, even if implemented less frequently than stated in the proposal, would have been highly beneficial for the project. In its future funding activity, GambleAware should be monitoring whether appropriate project control mechanisms are in place and ensure capacity for doing so.

### 2.2.2.2 Effectiveness of the delivery mechanisms

According to the final project report, drawing on the data captured by the delivered provider, the majority of the sessions with prisoners were well received. The average session rating, reflecting participants’ thoughts about how useful they found the sessions they attended, was 9 out of 10 (Base=587).

Our interviews with senior staff from HMP Forest Bank, who observed multiple sessions, were overall consistent with this, with several respondents describing sessions delivered by EPIC staff as engaging and powerful.

Evidence about effectiveness of sessions with prison staff and probation officers was not systematically captured by the delivery provider and only some snapshots were available to evaluation team to review. Where data was available it was very positive. For example, 96 per cent of sessions participants representing four different CRCs (Base = 108) found the session delivered by EPIC useful. The proportion of those who highlighted it as ‘extremely useful’ was impressive high, at 77 per cent of participants. Similarly, CRC representatives who were involved in the evaluation interviews praised the quality of the sessions that they attended.

> We’ve had [the delivery provider’s team] to deliver an awareness-raising session for staff. They spoke about their personal experiences [of gambling and gambling-related harm] and staff were just absolutely blown away. They were so engaged during the session. I heard people saying, ‘Wow, I’m just shocked. I’m going to remove the app from my phone. I’ve never thought of it like that’.
>  
> **Senior member of staff at HMP Forest Bank**

> The training was really good. It was centred around [the facilitator’s] experiences [of problem gambling] and the impacts that it had on his and his family’s life, his career. It gave you some insight into what it’s like in the mind of someone who’s got a gambling problem, which was really interesting and useful. In our role, we are so used to managing risk and just looking at somebody as what their actions are, we don’t always get the privilege of them
being entirely open and honest with us, [which makes it harder for us to spot issues and help them]. Because of this honesty and openness the session was quite emotive too. It was engaging, informative and we left wanting to help people affected by these problems.

Probation officer, CRC

There was however a degree of disagreement within the feedback data that was analysed by the evaluator. This related to the role and benefits of the session facilitator sharing his personal story of dealing with gambling problems and related harms, which was central to training sessions aimed at all target groups. Most of the feedback we heard frame a range of stakeholders and could see in prisoners’ written responses, identified the personal story shared by the facilitator as powerful, authentic and relatable. A number of different types of stakeholders highlighted that it was the personal story that was the most impactful element of the training, one that helped participants engage with the session content in depth and helped some participants realise that they had a problem that they needed to do something about.

But there were also others, who firmly believed that ‘a personal story is not enough’ and that sharing ‘an anecdote’ took too much time and attention, meaning that other useful elements of the session, such as information about signs of problem gambling, ways of controlling gambling behaviour or where to seek help and support, got to some extent neglected. There were even stronger views, where, based on their session observations and the feedback they have had from prisoners, senior prison stakeholders noted that for some participants a personal story as it was presented by the facilitator was off-putting, and they would have preferred training sessions to be more interactive, with a greater focus on other people’s, including participants’, own experiences. This was particularly true for sessions delivered at HMP Forest Bank, as the numbers of people involved were high and some attended multiple times, therefore a personal story which was effective when it was new, became less powerful as people became aware of it.

We’ve all heard the story a dozen times, so it’s got to a point where prisoners were getting a bit fed up of listening to it. Some of the feedback that we’ve had is that it’s all very interesting listening to [the facilitator] ... but he doesn’t let us speak up.

Senior member of staff at HMP Forest Bank

Some of the workforce representatives (prison and probation officers) involved in the evaluation interviews also commented that it was important for them to see multiple lived examples (for example through case studies of the different types of people they might be supporting) rather than a single and detailed individual story.

Overall, the stakeholder feedback suggests that whilst an authentic personal story is a powerful and effective engagement strategy and a way of showing to people affected by gambling-related harm that controlling gambling behaviour is possible, it is equally important to ensure that training
sessions 'build on the personal story rather than stop there’. Particular attention needs to be paid to instances when people attend multiple training sessions and ensuring sessions are tailored for different target groups.

### 2.2.2.3 Efficiency

Detailed financial reports outlining expenditure were not provided to the evaluation team, making assessments of efficiency challenging.

With this in mind, there is only one observation that we can make related to efficiency. The project budget, outlined in the proposal, specified the number of salaried staff days required to deliver the entire project. Such an approach can lead to inputs-focused project delivery, when undertaking an activity becomes an end in itself. Determining instead the resource required to achieve specific changes for beneficiary individuals and organisations, might be useful in identifying the most efficient and effective ways of achieving the desired outcomes.

### 2.2.3 Impact and sustainability

#### 2.2.3.1 Evidence-gathering (research) strand outcomes

During some initial scoping activities and the main training sessions, some data capture was carried out by the delivery provider to improve understanding of whether ‘gambling is a problem in the criminal justice system’, with the view of using such evidence to inform roll-out and scaling up of the project as well as any future delivery work in this sector.

According to the final project report, prepared by Northampton University by drawing on the data gathered by the delivery provider, 11.9 per cent of prisoners involved in the training sessions delivered as part of the project (Base = 620), requested and received treatment for problem gambling. In an earlier study carried out as part of the project set-up, 18 per cent of respondents stated that they ‘have had a gambling problem in the last 12 months either in or out of custody’ (Base 550). It is important to note that the bulk of these evidence-gathering activities were carried out in just one prison and that there were some errors in the dataset and limitations to the quality of the data that was gathered as part of the project (see section 1.3.3). Nonetheless, the available evidence supports the conclusion in the final project report stating that there can be more than 9,000 problem gamblers in the UK prisons that need support.
2.2.3.2 Education, awareness and training outcomes

Despite educational and training session delivery being a key project activity, no data about the outcomes for people who attended such sessions was collected by the delivery provider. This was due to a lack of understanding about what outcomes are and a lack of clarity about the desired outcomes for the groups targeted through this project.

It is important to note however that a lack of evidence and us being unable to draw conclusions about the project achievements in this area does not mean that there no positive outcomes for the training participants. On the contrary, all primary evidence, albeit only qualitative in nature and captured for a relatively small sample of participants, suggests that people who attended the training delivered by EPIC Risk Management gained in their awareness of gambling-related harm and how this can be prevented and minimised.

Feedback that was captured from prisoners suggests that most commonly participants developed their (in order of diminishing level of impact):

- Understanding that gambling can be addictive and how easy it is to ‘get sucked in’
- Awareness of what to watch out for when they gamble and how to better control their gambling
- Understanding that gambling can lead to other serious problems
- Knowledge of where to seek help and support about gambling problems.

In addition, some prisoners reported realising they may have a gambling problem as a result of attending the project sessions.

Interestingly, the latter also emerged as an outcome for some prison staff, according to our interview data. Senior stakeholders within Forest Bank spoke about the importance of preventing problem-gambling amongst prison staff as well as inmates, by alerting them about the ease with which things can escalate, which they felt was achieved during the project sessions.

Our interviews with prison and probation officers and senior staff from the respective organisations suggest that as a result of attending the project sessions, not only were they able to improve their awareness of problem-gambling, how to recognise it and how to offer help to people in the CJS that they have a duty of care for, by sign-posting them to appropriate treatment and interventions, they also felt confident and able to apply it in their workplace.

It is important to note however that systematic evidence collection is needed to confirm whether positive outcomes illustrated in this section are experienced by all of the majority of participants in the sessions delivered by EPIC in the CJS, or only individuals.
2.2.3.3 Client support

As already stated earlier in this report, the additional support offered by EPIC Risk Management to convicted individuals when they indicated a need for it was very informal. No evidence about the effectiveness or impact of ‘checking in’ conversations or accompanying prisoners to their counselling sessions, making sure that they sustain their engagement with support, was captured.

In addition, in the vast majority of cases (eight out of ten prisoner case studies that were reviewed by the evaluator), where impressive positive changes were achieved for clients identified as needing support with their gambling and experiencing gambling-related harm, such clients also engaged with the treatment services offered by Beacon Counselling Trust, making it impossible to attribute impact to specific inputs by the project delivery or the treatment provider. According to staff from the treatment provider organisation, who were involved in the evaluation interviews, both parties had an equally important role to play in supporting problem gamblers in prison.

As a counselling services provider] we’re not commissioned, nor are we skilled, nor do we have the time to be out there actively promoting the issue of problematic gambling within the prison process, this takes time. The reality of it is, this is a hard to reach group. By definition, hard to reach groups are hard to reach and it takes time. So, [EPIC] are out there promoting these issues within the prison environment. They’re promoting, they are raising awareness, and those then who are, through that process, electing to come into treatment, we are there ready, able, and waiting to support them. So, the [educational programme delivered as part of this project] is a conduit. For us, it acts as an integral part of our criminal justice work to get people into treatment. I believe that when the two [education and treatment] work in isolation, without that dovetailing, without that conduit, I would say that that has little merit.

Senior member of staff within the treatment provider organisation involved in the project

Regardless of the issues of attribution of impact, some impressive outcomes have been achieved for a number of prisoners who were involved in and accessed support through the project.

According to the data shared by the treatment provider:

- 24 clients (prisoners involved in treatment sessions) have been referred for counselling provision, since the service started in November 2017. Of these:
  - Five did not begin sessions following the initial assessment, due to being transferred to other prisons.
  - A total of 10 clients were transferred to other prisons during their period of treatment and were unable to complete their treatment and further two were released from prison
  - Seven clients completed a period of treatment of at least eight sessions.
Of the seven clients who completed at least eight sessions, PGSI scores were shown to reduce over the period of treatment, which was attributed to a combination of restriction of gambling opportunities in prison and the positive effect of sessions in providing an alternative focus and increased insight into behaviour.

CORE scores in respect of the same seven clients, were shown to fluctuate throughout the period of treatment, in response to daily environmental stressors and concerns about personal circumstances. However, CORE scores in all clients showed some reduction by the end of treatment period.

There were also other indications that treatment had progressed well and had effected some psychological change. For example, some clients accessed educational and training courses and took on cleaning responsibilities. Increased awareness and insight into underlying factors that have maintained their gambling cycle, combined with psychoeducation around the CBT model of problem gambling, its addictive nature and impact on functionality, has enabled all clients who completed at least five sessions, to acknowledge and address underlying issues, recognise strengths, consider alternatives, and increase motivation to make changes.

Feedback from clients has been very positive. Those who were released during their episode of treatment, said they intended to re access the service in the future, and a partner of one of them had contacted the service to access support. Clients who were anticipating a transfer said they would seek to continue sessions if available in the new prison.

Similarly, evidence captured by the delivery provider and highlighted in the final project report shows that as a result of being involved in the project:

- Two prisoners were granted early release, that they would have otherwise not been eligible for
- Prison category was downgraded for three people
- Two prisoners were classified as no longer being at high risk of self-harm and no longer needing to be in a high dependency unit
- There were also instances of successful reintegration into society and rehabilitation.
2.2.3.4 Organisational impact and sustainability

2.2.3.4 Sustainability

According to the evidence collected for evaluation purposes, there are three dimensions that need examining with the view of understanding the project’s higher level – organisational – impact and sustainability of its processes, achievements and outcomes.

The first one relates to workforce representatives being able to apply and build on their learning gained through the training sessions, to for example, change or develop practices, systems and processes in their organisations. Whist no systematic evidence collection in this area has been carried out by the delivery provider and is something for EPIC to consider in the future, there were several instances when people involved in the evaluator interviews described just that. Most commonly, senior colleagues in prison and CRC settings, involved in the evaluation, were introducing screening for problem gambling and developing their own training programmes and modules so that they could raise awareness of problem gambling and gambling-related harm in their contexts as well as of the support mechanisms that are available. It is important to notice however that people who were describing these changes which they had been able to put in place or were in the process of introducing, we clearly driven, experienced and self-directing professionals, having the power within their organisations to make such changes happen. Based on the evidence we have; we cannot extrapolate such changes and outcomes to all prison and probation setting staff involved in the project.

The second dimension relates to the model where education and treatment within a prison (or other setting) work together, ‘dovetailing’ and reinforcing each other, which was outlined earlier in this report. This model was put in place in Forest Bank over the course of the project, as a result of multiple organisations (EPIC, HMP Forest Bank, Beacon Counselling Trust and GambleAware)’ efforts. The model was perceived as effective by all stakeholders involved in the evaluation and might be worth being replicated. According to our interviews with senior staff in Forest Bank, they were looking for ways of ensuring that the model, with some practical and logistical adaptations, remains in place after the completion of the project.

The final dimension relates to the question of whether the level organisational, and ultimately the sector, impact of the project is as high as it could have been. This is particularly relevant to the delivery provider’s work with its key partner – HMP Forest Bank. There was evidence from the interviews, suggesting that a more strategic approach, focused on organisational development and

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10 With the exception of GambleAware, whose views on the matter were not surveyed, to ensure impartiality and independence of the evaluation findings.
capacity building within Forest Bank rather than mainly doing training delivery and working directly with prisoners could have been adopted sooner, if not from the very beginning of the project. Whilst recognising the importance of direct delivery and evidence-gathering from a ‘proof of concept’ and ‘convincing sceptics’ point of view, several senior stakeholders from Forest Bank felt that their internal capacity and expertise was under-used within the project. They highlighted that exploring ways in which education and awareness-raising work related to problem gambling could be gradually done by prisons (and other settings within the CJS) themselves, through strengthening their capacity and expertise, should have been a priority for the project before rather than after its completion, to further maximise its impact and future reach.
### 2.3 Summary-level assessment of the project against its objectives

In this section we provide an analysis of whether the project objectives have been achieved, which also offers a final summary-level assessment of the project.

In total, 11 objectives were stated in section D of the proposal. Below, all objectives are stated exactly as they are framed in section D of the proposal. Where relevant, commentary explaining the judgement made by the evaluator is provided.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>One objective was achieved:</strong></td>
<td></td>
</tr>
<tr>
<td>Objective 9</td>
<td>Provide education and awareness to members of the criminal justice system on gambling-related harm</td>
</tr>
<tr>
<td><strong>Seven objectives were partially achieved:</strong></td>
<td></td>
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<tr>
<td>Objective 2</td>
<td>Create a successful programme that can be replicated on a national basis in a self-sustained way across all functions of the criminal justice sector of Great Britain</td>
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<tr>
<td></td>
<td>Whilst there were some indications suggesting the programme was successful in its delivery to prisoners, prison and probation officers, the evidence set was far from comprehensive. A very small amount of evidence was available for community-based convicted individuals or those awaiting sentence, making it impossible to draw conclusions ‘across all functions of the criminal justice sector of Great Britain’. Similarly, there is not enough evidence to conclude that the programme is ready for scaling up or that it can be delivered or implemented in self-sustainable ways.</td>
</tr>
<tr>
<td>Objective 4</td>
<td>Target areas of greatest need to achieve maximum impact</td>
</tr>
<tr>
<td></td>
<td>There was some but minimal evidence of targeted or tailored approaches being used. Whilst multiple training sessions were offered on demand, these were repeat and not follow-up sessions. Targeting was strong where treatment services were concerned but these were carried out by another organisation.</td>
</tr>
<tr>
<td>Objective 5</td>
<td>Ensure service user input throughout life cycle</td>
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<td></td>
<td>Prisoner inputs were mainly sought in the early stages of the project. There were however several instances when feedback from partners regarding the content of awareness-raising sessions in prisons was actively sought and acted upon when provided.</td>
</tr>
</tbody>
</table>
| **Objective 6**  
Transparent monitoring, evaluation and review of project | Arrangements for monitoring and review were initially put in place but there were not sustained throughout the life of the project. |
|---|---|
| **Objective 8**  
Allow GambleAware and other stakeholders to improve their understanding of impact of gambling-related harm | Due to the limitations of the evidence that was gathered as part of the project, highlighted in earlier sections of the report, its ability to improve understanding of gambling-related harm in the criminal justice will be lower than could have been. There was no evidence to suggest that ‘questions were designed to maximise understanding across a wide range of subjects’, as there was no differentiation between them and evidence that was gathered lacked specificity and detail. |
| **Objective 10**  
Create and communicate an established intervention pathway in conjunction with existing CJS offering. To include helpline and introduction support services such as counselling, debt advice and medical provision | Signposting information was included in the sessions and the aide memoir leaflets. A treatment pathway (counselling) was put in place in Forest Bank which can be viewed as one of the key successes of the project. However, the extent to which this was driven by the delivery provider, or the commissioner or both, is unclear. According to our knowledge, no similar pathways were created in other prisons. There was some evidence that CRCs involved in the project received help from the delivery provider in identifying local services and support so that appropriate pathways were in place. |
| **Objective 11**  
Increase ability of leaders ... to recognise symptoms and understand how to help in order to minimise gambling-related harm | Evidence gathered by the evaluation team through feedback forms and interviews suggests that some workforce representatives including those in leadership positions improved their awareness of gambling-related harm, including recognising its symptoms. However, we do not have evidence to support this claim at scale as such data was not collected by the delivery provider. |

**One objective was not achieved:**

| **Objective 1**  
Gather meaningful accredited data across a wide range of data subjects and service users in order to facilitate an evidence-based approach to the reduction of gambling-related harm amongst those within the criminal justice system in Great Britain | Data was not captured from all target groups as was proposed. In particular, nether outcomes nor processes data was available, making it impossible to reliably identify effective evidence-based approaches developed and used within the project. In addition, according to our knowledge, there were irregularities in how data was collected. For example, informed consent was not secured prior to data, |
We do not have sufficient evidence about these two objectives:

- Objective 3: Encourage investment by criminal justice stakeholders.
- Objective 7: Ensure findings are disseminated to GambleAware stakeholders (this refers to inception, interim and final reports).
3 CONCLUSIONS AND RECOMMENDATIONS

3.1 Project successes

There were many areas where this project, delivered in the criminal justice system, was successful. This relates to the relatively high levels of penetration (numbers of prisoners and staff trained and supported) within one category B prison as well as the programme activities reaching two other prisons and 15 CRCs. Approximately 1,000 different stakeholders within the criminal justice system took part in the training sessions delivered as part of the project. Whilst there were some limitations and gaps in the evidence, the data that was available suggests that the project sessions were almost universally well received and highlighted as useful by prisoners and staff in prison and probation settings.

As well as improving target groups’ awareness of gambling-related harm and how it can be prevented and minimised, evaluation evidence highlighted further, more long-term outcomes for some prison and probation settings staff, who felt confident and able to apply their learning in their workplace by changing or developing practices, systems and processes in their organisations.

A model, integrating provision of education and treatment services related to problem gambling within a prison setting, that has been implemented at HMP Forest Bank as part of the project, should be viewed as one of its main successes. Not only did this enable the project to achieve highly impressive outcomes for some prisoners affected by problem-gambling issues, it also established an example of multi-stakeholder way of working where different elements strengthen and reinforce each other, creating an effective system of support for a vulnerable population group.

3.2 Summary of key lessons learnt

There were also some areas where, with some changes, impact of the project could have been stronger, and these are worth considering in future project delivery.

- There was a range of stakeholders in different roles and representing different organisations, who suggested that projects of this kind can and should think about strategic aspects of their potential impact sooner in the implementation timeline. Focusing on enabling the organisations they work with to develop and expand their capacity, rather than continuing own direct delivery is something for delivery providers of future projects to consider.
In turn, commissioners and partner organisations need to be clear about their expectations for a project to include organisational development, working at system or sector level, so that strategic aspects of the project delivery had continual prioritisation from all involved.

Similarly, where the commissioner has strong preferences and expectations related to breadth of engagement and/or depth of reach and impact, these need to be clearly and formally communicated.

There were also some issues related to evidencing project outcomes and having clarity about the latter, where shortcomings were such that they prevented some of the project objectives to be achieved and limited the extent to which the impact of the project can be reported. These areas need to be strengthened in any future delivery.

### 3.3 Recommendations

**GambleAware should:**

- Ensure its requirements and expectations for any work being commissioned are fully clear and transparent. This is particularly important for projects the aims and implementation of which are expected to comprise strategic as well as direct delivery work. In practice, strategic work often slips in favour of more straight-forward to plan, deliver and monitor direct delivery work. Therefore, strategic work often needs greater attention and prioritisation and this might need to be modelled by the commissioner. If clear guidance about expectations cannot be offered within a project specification, it should be achieved prior to the beginning of the project. If requirements, expectations or priorities (including regarding the balance of the project activities) change or get refined during the project implementation, they should be clearly and formally communicated to and agreed with the delivery provider.

- Ensure that there is evidence of clearly defined project outcomes, short and longer term, at individual, organisation and if appropriate system or sector levels, as well as ways of achieving and monitoring them, prior to any work commencing.

- Where funding is awarded to projects involving multiple parties and relies on partnership-working, roles and contributions of all parties need to be clearly defined.

**EPIC Risk Management should:**

- Consider developing internal expertise to ensure good understanding of project inputs, processes, outcomes and inputs.
• Systematically capture immediate/short-term outcomes for all target groups of people involved in its projects. Where relevant, EPIC should also try and gather evidence about longer-term impact for project participants, particularly those who are involved in more intensive and/or extended delivery activities, as well as collecting evidence about organisational changes and developments within the settings that it supports.

• Systematically gather feedback from training participants, service users and other beneficiaries, related to effectiveness of processes and how these can be improved, as well as evidence of outcomes. This information should be used for continual improvement and development as well as reporting purposes and to secure future funding.

• Draw on external expertise, or invest in developing internal expertise, so that any future delivery activities have a clear logical framework underpinning them, are outcomes-focused and that appropriate data capture processes (including ensuring informed consent and adhering to data protection regulations) and instruments are in place.
APPENDICES

Appendix 1 Research questions

The first evaluation aim (see introduction) was broken down into a series of research questions:

Relevance

• To what extent do the interventions fit with the needs and priorities of the target group and all relevant stakeholders(s)?
• To what extent did the interventions fit with the objectives of the original Invitation to Tender?
• Who was involved in the design of the project?
• Is there a clear logical framework associated with the project, clearly outlining objective, outcomes, indicators of achievement, means of verification?
• Were the expected results/desired outcomes realistic?

Appropriateness

• Were the interventions/activities consistent with the intended outcomes?

Effectiveness

• To what extent was the choice of the interventions and delivery mechanisms appropriate, in the context of the delivery?
• To what extent did the interventions adapt to changing need or circumstances/were responsive to recommendations?
• To what extent were the planned activities carried out to plan (and as per the agreement on which the grant was awarded) and within the timeframe set? Where they weren’t, why not?
• To what extent were the delivery mechanism effective and which of their aspects were linked with improved outcomes for target groups and stakeholders?

Efficiency
• To what extent was there overspend/underspend on the budget? Is the financial report consistent with the status of implemented activities, activities that were delayed/cancelled?

Impact

• What were the positive (and negative) changes that have occurred—preferably measured against a set of realistic “desired outcomes”?
• To what extent did the intervention make a real difference to the lives of those it was intending to improve?

Sustainability

• To what extent will the intervention continue if funding ceases?
• What needs to be put in place for the interventions to continue and be further built on?

Appendix 2 Documents reviewed as part of this evaluation

To prepare this report, the evaluation team reviewed the following types of documents:

• Formal documents
  o Project specification
  o Project proposal
  o Delivery provider’s contract with GambleAware and with it research partner
  o Two project progress reports
  o Outputs prepared by the research partner—feedback about evidence being captured and ways of improving this and the final project report

• Training materials and resources developed for awareness raising and data gathering purposes

• Evidence gathered and shared by the delivery provider
  o A dataset containing evidence about prisoners’ involvement in the project and a sample of scanned copies of the paper records which had been entered into the electronic dataset prior for analysis and reporting
  o Case studies of individuals
  o Testimonials from convicted individuals and organisations and their staff involved in the project
Summary of the quantitative data captured through OMBEA (NB: raw datasets were not available) related to probation officer training

- Evidence from the partner organisation delivering treatment services in Forest Bank
- Correspondence between the delivery team and 1) their partners, 2) the commissioner, 3) representatives of other organisations, such as CRCs, involved in the project.
<table>
<thead>
<tr>
<th>Chrysals recommendation to provider</th>
<th>Provider response</th>
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<td><strong>Criminal Justice pilot programme – Delivered by EPIC PGC</strong></td>
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| Consider developing internal expertise to ensure good understanding of project inputs, processes, outcomes and inputs. | EPIC have a new centralised Project Management and Research function and we also work closely with our academic partners.  
Capacity within the team is significantly increased in support of key projects.  
Project management of all commissioned activity requires all changes to planned activity to be logged in the relevant documentation, and agreed by contract if necessary, ensuring availability of the decision-making process for future review. |
| Systematically capture immediate/short-term outcomes for all target groups of people involved in its projects. Where relevant, EPIC should also try and gather evidence about longer-term impact for project participants, particularly those who are involved in more intensive and/or extended delivery activities, as well as collecting evidence about organisational changes and developments within the settings that it supports. | EPIC have a new centralised Project Management and Research function and we also work closely with our academic partners.  
EPIC are conducting high profile and extensive programmes with expert partners.  
EPIC has a new Social Impact reporting function using a Big 4 consultancy company and leading academic university. |
| Systematically gather feedback from training participants, service users and other beneficiaries, related to effectiveness of processes and how these can be improved, as well as evidence of outcomes. This information should be used | This feedback is taken on board and EPIC are always looking to improve rigour and process as we continue to extend our work across the UK, Europe and America.  
EPIC have a new centralised Project Management and Research function and we also work closely with our academic partners. |
for continual improvement and development as well as reporting purposes and to secure future funding.

<p>| Draw on external expertise, or invest in developing internal expertise, so that any future delivery activities have a clear logical framework underpinning them, are outcomes-focused and that appropriate data capture processes (including ensuring informed consent and adhering to data protection regulations) and instruments are in place. | EPIC have a new centralised Project Management and Research function and we also work closely with our academic partners. |
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<td>All projects now have clear and articulated theory of change and agreed KPIs and reporting protocols prior to contracting. Capacity within the team is significantly increased allowing the strategic remit of the DoE to be applied more appropriately in support of key projects. Project management of all commissioned activity requires all changes to planned activity to be logged in the relevant documentation, and agreed by contract if necessary, ensuring availability of the decision-making process for future review.</td>
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<tr>
<td>Ensure that there is evidence of clearly defined project outcomes, short and longer term, at individual, organisation and if appropriate system or sector levels, as well as ways of achieving and monitoring them, prior to any work commencing.</td>
<td>See above regarding theory of change, KPIs and reporting protocols.</td>
</tr>
<tr>
<td>Where funding is awarded to projects involving multiple parties and relies on partnership-working, roles and contributions of all parties need to be clearly defined.</td>
<td>This learning is taken forward in designing and agreeing projects. A recent example of this is that Citizens Advice (E&amp;W) will be asked to sign a Memorandum of Understanding in relation to any support they might provide to Citizens Advice (Scotland) in establishing and delivering a service.</td>
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