

# UNGRIPP

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## **UNGRIPP's Response to the Ministry of Justice Criminal Legal Aid Consultation: Prison Law Proposals**

UNGRIPP is a grassroots campaigning and awareness group, led by families of people serving the Indeterminate Sentence for Public Protection (IPP), and supported by a wide range of individuals and organisations that wish to see change.

We exist to ensure a twelve-year abolished sentence cannot ruin more lives by campaigning for people who are serving an Indeterminate Sentence for Public Protection (IPP) to be resentenced.<sup>1</sup>

### ***Context***

As of March 2025, there were 2,544 people serving an IPP in prison. Although the IPP prison population is gradually declining, the reduction has been consistently low – with the rate of decline averaging 2% over the past year. Based on historical release and recall trends, at the very earliest we anticipate that it will be a minimum of 11 years before all people serving an IPP sentence in prison are released. That would be 36 years after the IPP sentence was introduced and 24 years after it was abolished.

1,532 (60%) of those serving an IPP sentence in prison have been recalled. 1,075 (71%) of those on recall have not committed a further offence. The average time spent in custody following recall on an IPP sentence is 25 months.

There are currently 1,004 people serving an IPP sentence beyond their tariff who have never been released. Those who are 10 to 20 years over tariff now make up 69% of those never-released, serving an IPP sentence. Of the 697 individuals who have served 10 to 20 years beyond their tariff:

- 177 (25%) had a tariff of less than 2 years
- 394 (57%) had a tariff of 2–4 years
- 110 (16%) had a tariff of 4–6 years
- 16 (2%) had a tariff of 6–10 years

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<sup>1</sup> <https://www.ungripp.com/>

Many people serving an IPP sentence experience significant mental health decline in prison for example, self-harm incidents among people who have been recalled between 2023 and 2024 rose by 288 cases, marking a 17% increase over the same period.<sup>2</sup>

It is estimated that the total cost to the exchequer in 2024 to keep 2,600 people in prison on an IPP sentence reached £145m.<sup>3</sup> This is in addition to the estimated £1.6bn for keeping people serving an IPP in prison in the first 10 financial years after the law was repealed.

The Government is currently relying on an IPP action plan to fix this situation. However, this action plan has been in place since April 2023 and the situation for those serving an IPP sentence has not significantly changed.

**Question 6: Do you agree with the proposal to increase prison law fees by 24%? Please state yes/no/maybe/do not know and provide reasons.**

Yes we agree with this proposal. UNGRIPP focuses specifically on the Indeterminate Sentence for Public Protection (IPP) and the injustices faced by those serving it. While the question of prison law fees relates to the broader system affecting people in prison, UNGRIPP's primary concern is ensuring that individuals on IPP sentences have access to effective legal representation to challenge their ongoing detention and seek release.

From UNGRIPP's perspective, any measure that strengthens access to justice for people in prison is welcomed, especially given the dire state of legal aid in recent years. We note that the Association of Prison Lawyers (APL) has welcomed the proposed 24% increase in prison law fees, stating it is "hugely welcome and long overdue" and an "essential first step towards making prison law legal aid work sustainable."<sup>4</sup> They highlight that prison law legal aid rates have decreased significantly in real terms (by 37% since 2011) and that many practitioners are struggling.

For those serving IPP sentences, consistent and well-funded legal advice is crucial. These are often complex cases, requiring detailed understanding of parole board processes, risk assessments, and the unique challenges faced by those serving an IPP sentence in demonstrating progress and securing release. Without adequate legal representation, on an IPP sentence, many of whom have already served vastly beyond their original tariffs, face even greater obstacles to justice and a prolonged, often arbitrary, detention.

However, UNGRIPP would also emphasize that this increase, while positive, must be viewed as a starting point. We would advocate for ongoing commitment to sustainable funding for prison law, including measures to account for inflation and the increasing complexity of cases, to truly ensure meaningful access to justice for all those who are in prison, especially those trapped in the unique and deeply flawed IPP system.

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<sup>2</sup> <https://www.gov.uk/government/collections/prison-population-statistics>

<sup>3</sup> <https://www.independent.co.uk/voices/editorials/ipp-prison-imprisonment-public-protection-cost-b2736399.html>

<sup>4</sup> [https://www.associationofprisonlawyers.co.uk/wp-content/uploads/2025/07/APL-Response-to-Criminal-Legal-Aid-Consultation\\_01.07.pdf](https://www.associationofprisonlawyers.co.uk/wp-content/uploads/2025/07/APL-Response-to-Criminal-Legal-Aid-Consultation_01.07.pdf)

**Question 13 - From your experience, are there any groups or individuals with particular protected characteristics who may be particularly affected, either positively or negatively, by the proposals in this paper? Please include which groups/individuals and explain your reasons. We would welcome examples, case studies, research or other types of evidence that support your views.**

**Question 14 - What do you consider to be the equalities impacts on individuals with particular protected characteristics of each of the proposals? Are there any mitigations the government should consider? Please provide evidence and reasons.**

In answering this question we will be solely focusing on the 24% Uplift for Prison Law Fees and how this could impact people who are serving an IPP sentence:

**Potential Positive Impact:**

People serving IPP sentences are an exceptionally vulnerable group, many of whom have developed mental health conditions, disabilities, or are ageing within the system. A substantial uplift in prison law fees directly addresses the ability of solicitors to provide the detailed, ongoing support necessary for these complex cases. This improves access to justice for a group disproportionately impacted by systemic failures.

Prison law often involves challenging detention under mental health legislation or securing appropriate provisions for those in prison with a disability. Better resourced solicitors can better advocate for these individuals.

Effective legal advice for Parole Board hearings and resettlement plans is crucial for all people in prison, but particularly for those individuals who are serving IPP sentences, reducing the "merry-go-round" of recall and re-release which has profound impact on mental health and social reintegration.