



HM Prison &  
Probation Service

Action Plan Submitted: 30<sup>th</sup> May 2019

A Response to the HMI Probation Inspection: National Probation Service,  
London Division

Report Published: 22<sup>nd</sup> May 2019

## INTRODUCTION

Her Majesty's Inspectorate of Probation is the independent inspector of youth offending and probation services in England and Wales. It reports on the effectiveness of probation and youth offending service work with adults and children.

In response to the report, HMPPS/MoJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plan provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are published on the HMI Probation website. Progress against the implementation and delivery of the action plans will be monitored by HMPPS/MoJ and reviewed annually by HMI Probation.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There <b>must</b> be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There <b>must</b> be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



ACTION PLAN: London NPS

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner (including named individuals and their functional role or department)	6. Target Date
1	<p><b>London NPS</b> should ensure that risk of harm is fully considered and assessed in all cases, including to children and victims, using all relevant assessment tools including ARMS</p>	Agreed	<p>NPS London will establish a new Public Protection &amp; Service Delivery (PPSD) Board, chaired by Interim Chief Operating Officer (COO).</p> <p>NPS London will monitor quality and performance improvements in line with recommendations by devising a Public Protection Dashboard. Dashboard data will be reported to the PPSD board on a monthly basis.</p> <p>ARMS refresher briefing will be delivered to all teams by Quality Development Officers (QDOs) and/or Senior Probation Officers (SPOs).</p> <p>Increased Active Risk Management System (ARMS) completions will be monitored via the Public Protection dashboard at the Public Protection Service Delivery (PPSD) Board.</p> <p>The London Improving Practice and Developing (LIPaD) case audit process will be rolled out, ensuring the audit of 8-10% of the community caseload every year.</p> <p>The Divisional Vulnerabilities Plan will be refreshed, to focus on an uplift in safeguarding children, safeguarding adults and domestic abuse practice. This includes reviews that incorporate information from other agencies such as Children's Services and Police.</p>	<p>Chief Operating Officer and Head of Public Protection</p> <p>Head of Performance &amp; Quality</p> <p>All Heads of Service</p> <p>Chief Operating Officer and Head of Public Protection</p> <p>Head of Performance &amp; Quality and Chief Operating Officer</p> <p>Head of Public Protection</p>	<p>Complete</p> <p>June 2019</p> <p>January 2020</p> <p>June 2019</p> <p>June 2019</p> <p>July 2019</p>
2	<p>London NPS should improve the delivery of services most likely to reduce the risk of harm to others</p>	Agreed	<p>In order to increase use of Accredited Programmes for those subject to licences, London NPS will continue to promote the Rate Card and monitor usage via the Corporate Governance &amp; Services Meeting and PPSD Board.</p> <p>NPS London will continue to promote the use of sexual offending behaviour programmes for service users subject to Community Orders and Licences. This will be monitored at the PPSD Board.</p>	<p>Chief Operating Officer, Head of Stakeholder Engagement, Head of Performance &amp; Quality</p> <p>Head of Public Protection</p>	<p>Complete and ongoing</p> <p>Complete and ongoing</p>



			<p>The Effective Proposal Framework (EPF) tool will be actively used at courts, in order to ensure that appropriate interventions are imposed as part of community disposals, including accredited programmes and Rehabilitation Activity Requirements.</p> <p>NPS &amp; Community Rehabilitation Company (CRC) accredited programme roadshows will be delivered to frontline Offender Managers (OMs) to enhance knowledge, and engagement with programmes, to drive referrals on licences.</p> <p>All Offender Managers (OMs) will use the <i>CRISSA</i> structured supervision framework to plan and record supervision sessions, to ensure that intervention is meaningful and the frequency of reporting is sufficient to manage the risk of harm and implement the sentence plan.</p> <p>Heads of Service (HoS) will actively increase use of the London Offender Management Toolkit, to ensure that service users are routinely engaged in meaningful structured one-to-one interventions to support their desistance. Usage of the OM Toolkit will be monitored via the PPSD Board.</p>	<p>Head of Courts &amp; Enforcement</p> <p>Chief Operating Officer &amp; Head of Performance &amp; Quality</p> <p>All Heads of Service and HoS Lead for OM Toolkit</p> <p>All Heads of Service and HoS Lead for OM Toolkit</p>	<p>June 2019</p> <p>October 2019</p> <p>June 2019</p> <p>June 2019</p>
3	London NPS should keep the progress of supervision under review, updating assessments and plans where appropriate but particularly when there has been a change in circumstances	Agreed	<p>All OMs have been instructed by the Divisional Director to review Community Offender Assessment System (OASys) assessments every four months for the next twelve months, to embed and promote best practice. A bi-annual audit of OASys, using the NPS Assessment Quality Assurance Tool, will be used to drive quality and provide assurance of improvement.</p> <p>A review process will be implemented for Multi-Agency Public Protection Arrangement (MAPPA) Level 1 cases, proactively accessing information from partner agencies. This will be reported on the Public Protection Dashboard, and monitored via the PPSD Board.</p> <p>Learning from Serious Further Offences will be reviewed with the Metropolitan Police, to ensure that the police systematically escalate concerns to NPS, i.e. in relation to knife and gun crime to assist the division in undertaking appropriate enforcement.</p> <p>All Offender Managers will use the <i>CRISSA</i> structured supervision framework to plan and record meaningful interventions linked to sentence plan and to provide an ongoing review of progress.</p> <p>All managers will be trained in Skills for Effective Engagement, Development and Supervision (SEEDS2), will undertake observations of OM practice and provide developmental feedback.</p>	<p>Divisional Director, Chief Operating Officer and Head of Performance and Quality</p> <p>Head of Public Protection and Chief Operating Officer</p> <p>Chief Operating Officer</p> <p>All Heads of Service</p> <p>All Heads of Service and HoS Lead for SPO Development Programme.</p>	<p>July 2019</p> <p>July 2019</p> <p>September 2019</p> <p>Complete</p> <p>September 2019</p>



			<p>The London Improving Practice and Developing (LIPaD) case audit process will be rolled out, ensuring the audit of 8-10% of the community caseload every year.</p> <p>Heads of Service will ensure the full roll out of Lifer Review Panels and Indeterminate Public Protection (IPP) Panels.</p>	<p>Chief Operating Officer and Head of Performance and Quality</p> <p>All Heads of Service</p>	<p>June 2019</p> <p>June 2019</p>
4	London NPS should improve the identification of those individuals eligible for the victim contact scheme	Agreed	<p>HoS to agree and implement processes with Witness Care Unit senior management to ensure all statutory cases are identified and referred. These arrangements will be reviewed quarterly.</p> <p>Victim Liaison Officers (VLOs) will ensure Victim contact registrations in Delius are reviewed regularly and verified as part of monthly data cleansing activity days. Parallel monthly data cleansing activity by OM's will be undertaken. Where Victim Contact information is not identified or up to date, OM's will refer to the Victim Liaison Officer/Victim Liaison Unit (VLO/VLU).</p> <p>All existing legacy cases and databases will be transferred to the Victim Contact Management System (VCMS) to ensure that all victim records are recorded on a single system.</p>	<p>Head of Victim Contact Service (VCS)</p> <p>Head of VCS, Head of Cluster (Bexley, Bromley &amp; Greenwich), Head of Cluster (Hounslow, Kingston and Richmond) and all Heads of Service.</p> <p>Head of VCS, Head of Cluster (Bexley, Bromley &amp; Greenwich) and Head of Cluster (Hounslow, Kingston and Richmond)</p>	<p>May 2019 and ongoing</p> <p>June 2019</p> <p>September 2019</p>
5	London NPS should maximise engagement with the victim contact scheme and improve the quality and consistency of services delivered.	Agreed	<p>The NPS London Divisional Director will implement a Victim Governance Board to oversee the Performance Improvement Plan.</p> <p>A Business Manager will be recruited to ensure effective and consistent implementation of processes within the VLU.</p> <p>The Performance and Quality Team will provide the Head of VCS with access to monthly management information reports, to improve management oversight and accountability.</p> <p>The Business Manager will ensure a <i>high-profile case list</i> is maintained and contains accurate and up to date information, to ensure appropriate management oversight.</p>	<p>Divisional Director</p> <p>Head of VCS</p> <p>Head of Performance and Quality</p> <p>Head of VCS</p>	<p>June 2019</p> <p>Complete</p> <p>Complete and ongoing</p> <p>July 2019</p>



			<p>The VCS Quality Steering group will be relaunched, to promote staff development and ensure identified actions and improvements are delivered in a collaborative environment.</p> <p>All VLOs will complete mandatory training (including the Victim workbook and classroom training) by the end of Quarter 3 2019/20.</p>	<p>Head of VCS, Head of Cluster (Bexley, Bromley &amp; Greenwich) and Head of Cluster (Hounslow, Kingston and Richmond)</p> <p>Head of VCS, Head of Cluster (Bexley, Bromley &amp; Greenwich) and Head of Cluster (Hounslow, Kingston and Richmond)</p>	<p>Complete</p> <p>December 2019</p>
6	<b>HM Prison and Probation Service</b> should review recruitment and retention policies to support NPS London in sourcing and retaining the staff required to deliver a quality service.	Agreed	<p>Recruitment for London NPS is already devolved to the Division for all grades other than for new Probation Officers, known as PQiPs (Professional Qualification in Probation). The third PQiP cohort qualified in March 2019; office placements will take account of the NQO's LDU preference, with priority for business-critical posts. In addition, further NPS London learners are set to qualify in September 2019 and in March 2020. The projected number of PQiPs is anticipated to be sufficient to fill the majority of London NPS's current and forecast vacancies by the start of the 2020/21 financial year.</p> <p>NPS London will work closely with the central recruitment team to identify the ongoing PQiP placement requirements for NPS London, utilising forecasts with inbuilt attrition rates. In the likely event that further recruitment is needed, a cohort is expected to start in January 2020. Planning for this will begin in approximately August 2019.</p> <p>The MoJ Resourcing's marketing and attraction team are working to understand hard to fill vacancies and targeting media campaigns to be as localised as possible. Improvements to the recruitment process are on-going, aimed at reducing both the time and cost to hire, increasing the diversity of new recruits and ensuring that the right people with the right skills are attracted. HMPPS are committed to retaining existing staff and to seeing a strong and diverse workforce.</p> <p>The four-year average rates for Probation Officer attrition (all leaver reasons) is higher in London than the overall national position (as it is for other parts of the</p>	<p>Divisional Director and MoJ Resourcing</p>	<p>March 2020</p> <p>January 2020</p> <p>Complete and ongoing</p> <p>Complete and ongoing</p>



			South East); staff retention is a priority on a par with recruitment. NPS staff have recently transferred to revised Pay & Conditions under <i>NPS Pay Modernisation</i> , with an expectation that these changes will have a positive impact on staff retention. NPS continues to explore other 'localised' pay related mechanisms to aid retention and support attraction. Within London Division, priority is also given to other factors that have a bearing on staff retention including line manager capability; line manager spans of control; staff wellbeing/ engagement; workload management controls; workforce diversity and a number of activities that will contribute to increasing staff resilience.		
7	<b>The Ministry of Justice</b> should ensure that probation facilities are well maintained and provide a safe environment for both NPS staff and offenders.	Agreed	MoJ Estates has put in place a change and improvement plan, focused on the resolution of reactive and <i>Planned Preventative Maintenance</i> delivery, while also making improvements to processes. A dedicated estates team for probation has been created and a new Director of Facilities Management (FM) was recruited in February 2019 to support this change programme. Following a successful pilot in Kent, MoJ will also be rolling out a <i>handyman</i> service across the Probation Estate to undertake a number of lower level reactive works, that have an impact on the day-to-day running of sites. This list will include minor paint, fixtures, fitment and fabric works in addition to basic mechanical works.	MoJ Soft Facilities Management Manager	September 2019

