

Action Plan Submitted: 4 March 2020

A Response to the HMI Probation Inspection:

An Inspection of Central Functions supporting the National Probation Service

Report Published: 14 January 2020

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 (Specif 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 mus t 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 must 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: Central Themes 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
	Leadership				
	HM Prison and Probation Service should:				
1	Ensure that corporate services are structured and resourced appropriately and that there is a focus on improved understanding and delivery of the NPS's needs	Agreed	HMPPS and the MoJ HR will continue to work with the National Probation Service (NPS) to ensure that service provision is fit for purpose and within budget. There is an NPS Estates Board in place co-chaired by the Senior Responsible Officer of the Probation Reform Programme and the Director of Estates to monitor overall sufficiency of estates and FM provision, supported by the Probation Reform Estates Board to oversee estate investment as we rationalise NPS and CRC buildings.	Director of Operations & Delivery, MoJ People Group Director of Estates (MoJ) and Deputy Director for Business Strategy and Change	Completed and ongoing
			The HMPPS Digital and Data Sub-committee which oversees sufficiency of digital, data and technology (DDaT) provision to the agency, supported by the Probation Digital Board to oversee investment in our core systems and technology.	Director of MoJ Digital	
			The Probation Workforce Programme, led at Director level has been created to ensure we have a sufficient grip on recruitment, training and staff retention.	Director, Probation Workforce Programme	
2	Hold the providers of corporate services to	Agreed	A revised governance arrangement will be introduced for estates including a monthly director-level meeting to ensure key issues	Deputy Director,	December 2020

	account for the services they deliver to probation		relating to estates are managed effectively. A new probation reform programme estates board will tackle the day to day management and oversight of critical estates activity in probation and will be chaired by the reform programme's programme manager and attended by senior MoJ estates colleagues. This Board will assure the programme and NPS that property strategies and delivery plans are being realised. These arrangements will be supported by regional estates sub boards that will drive forward the estates projects needed for the reform programme (which will ensure local, operational ownership of property strategy decisions).	Business Strategy and Change	
			In addition, a joint NPS-MoJ Estates Facilities Management (FM) working group will find opportunities to improve the service provided by the FM contract and hold estates colleagues to account in driving up FM performance. The recruitment of a National Estates Lead support role will provide the capacity to ensure the establishment and development of the latter (e.g. process clarification); as well as undertaking assurance activity across all Estates Sub Boards (to achieve consistency and assist issue resolution).	Deputy Director, Business Strategy and Change	Completed
			In the digital and technology area, the new Digital, Data and Technology (DDaT) board has support and leadership from digital, data and technology senior managers. The introduction of a new Deputy Director for MoJ digital services in probation [who attends the DDaT board] provides senior accountability in the digital space for the delivery of digital services in probation.	Deputy Director for MoJ digital services	Completed
3	Conduct a review to see if aspects of corporate delivery and facilities management	Partly agreed	This recommendation is partly agreed as lessons learned from the experience of implementing internally managed corporate services will enable HMPPS to take a view on whether conducting a review is suitable for the NPS. At that point HMPPS will explore options to	Chief Property Officer, MoJ	December 2020

	can be devolved to the divisions where this will improve delivery		 take this work forward with digital and estates colleagues. MoJ Estates acknowledge that FM Service Delivery to probation must improve and steps are being taken to achieve this outcome and will continue to improve through functional delivery, allowing probation colleagues to focus on probation work. MoJ Estates will establish a formal programme to drive forward the further improvement needed, with NPS having a substantive place on the programme board. The programme will also ensure that any relevant lessons learned from FM service provision in other parts of MoJ, for example HMCTS are incorporated. The new HMPPS People Plan sets the framework for Human Resources (HR) services. This approach will be embedded over the coming months alongside a review of the way the HMPPS Business Partner model works to support HMPPS stakeholders. A review of appropriate next steps will be completed once this has a chance to embed. 	Director of Operations & Delivery, MoJ People Group	December 2020
	Staff HM Prison and Probation Service should:				
4	Review NPS workforce requirements to ensure that there is an effective process to recruit sufficiently skilled staff in the numbers that are required to meet	Agreed	A workforce strategy will be developed which will set out a high- level approach to increasing capacity and efficiency within the NPS workforce. Following development of the Probation Workforce Strategy, work will be taken forward to develop delivery plans for recruitment of NPS staff to meet current forecast demand and the needs of the future unified operating model.	Deputy Director, Head of Strategy and Project Lead Capacity and Efficiency, Probation Workforce Programme.	March 2020 June 2020

	current and anticipated future demand		Staffing vacancies are now being addressed via the PQiP recruitment campaigns which has involved changing the qualification entry level, the length of the qualification, and attracting significantly higher numbers in the qualification framework.		Completed
			Target staffing numbers are being reviewed to consider the potential impact of future forecasting scenarios. Whole system staffing numbers are also being collated to support Unified Model demands. Further work will take place to review iteratively in line with the business plan process.	Senior Responsible Officer, Probation Reform Programme	March 2020
5	Review its approach to recruitment to better address the underrepresentation of black, Asian and minority ethnic and male staff in the workplace	Agreed	Our workforce strategy will set diversity and inclusion objectives and a high-level approach to improving diversity and inclusion within the workforce.	Deputy Director and Head of Strategy, Probation Workforce Programme	March 2020
6	Ensure that relevant information disclosed on diversity needs is collected and shared appropriately at all stages of the qualification process for probation officers	Agreed	Our workforce strategy will set out diversity and inclusion objectives and a high-level approach to improving diversity and inclusion within the workforce. As part of this, we will explore how we can improve the appropriate collection and sharing of data on diversity across the training process.	Deputy Director and Head of Strategy, Probation Workforce Programme	March 2020
7	Improve the accuracy and comprehensiveness of management	Partly agreed	This recommendation is partly agreed as the Workload Measurement Tool (WMT) is based on caseload therefore would be	Deputy Director of Business Strategy and Change	December 2020

	information produced by the workload measurement tool to support service improvement and staff's understanding, including applying the tool to other operational probation staff		difficult to apply to other grades of staff who don't directly hold a case. There already exists a continuous improvement working group for the WMT and through that arrangement we will review the data and assumptions used by the tool and update those to ensure the WMT reflects modern practice and calculations that determine the level of resource required in other operational grades such as the Senior Probation Officer and case administrator. HMPPS will review the tool to better support the role out of Offender Management in Custody (OMiC) and the introduction of a new tiering model in Wales.		
8	Review the role of the Senior Probation Officer in order to ensure that the workload is manageable	Agreed	A Senior Probation Officer (SPO) review project focussing on tasks, spans of control and related issues has been running since January 2019. Outcomes from that project so far are an agreement about management oversight tasks being incorporated within other tasks, implementation of a management co-ordination hub in each division/region to take transactional activities away from SPOs, and a menu of options which use other ways of providing support to new Probation Service Officers (PSOs) and those undertaking the Professional Qualification in Probation (PQiP) without relying upon SPO time. Still ongoing is work upon use of other grades of staff for some tasks which do not require an SPO skillset, and scoping of the current spans of control, with a view to proposing a new model to NPS the Senior Leadership Team (SLT).	Head of Innovation, Development and Change	April 2020
9	Ensure that learning and development resources meet the needs of staff in the NPS	Agreed	A workforce strategy will be developed which will set out HMPPS approach to enhancing learning and development offer for probation workforce.	Deputy Director and Head of Strategy, Probation Workforce Programme	March 2020
10	Identify the learning needs of all staff and provide access to	Agreed	A review of the current workforce capability needs will be undertaken. A workforce strategy will be developed which will set	Deputy Director and Head of Strategy, Probation Workforce	June 2020

	learning to ensure that all staff are sufficiently trained to carry out their tasks		out an approach to enhancing learning and the development offer for the probation workforce. An Annual Learning Plan (ALP) for 2020/2021 is in development to identify requirements and deliver suitable training across the NPS each year. This will be launched in March 2020. This is under constant review to identify and address needs across the business so that learning can be planned for delivery in each year.	Programme and Senior Responsible Officer, Probation Reform Programme	March 2020
			The Curriculum Authority, established in October 2019, ran by PD&C and chaired by the Chief Probation Officer and Executive Director for Women, is attended by a range of both internal and external stakeholders and has been set-up to identify and capture learning needs across the organisation. The board will review self- created as well as curated learning and make decisions on wider roll-out for all probation colleagues.	Deputy Director, Professional Development & Capability in Professional Development & Capability	Completed and ongoing
11	Ensure that efficient and effective use is made of probation	Agreed	To ensure a more targeted response to local needs the approach to recruitment campaigns for Probation Services Officers (PSOs) will been adapted from national to local recruitment campaigns.	Strategic Change Manger, NPS Services Design	April 2020
	services officers		The Probation Reform Programme is reviewing the design of Offender Management delivery. This will inform a new probation tiering framework to support consistent and efficient approaches to NPS PSO deployment in Offender Management.	Strategic Change Manager, NPS Services Design	May 2020
			Further work will seek to bolster the learning and development input into PSOs in the short term (NVQ3), in parallel to longer term solutions. Further work is taking place to explore whether HMPPS can externally source Band 3 level NVQ assessment.	Deputy Director, and Capability Project Lead, Probation Workforce Programme	April 2020
			HMPPS also continue to support colleagues through National Workforce Planning to identify ways to ensure we have the staff to undertake priority work. This includes routine review of the Workload Management tool to ensure the right staff oversee the right cases.	Probation Divisional Director for Business Strategy and Change	Ongoing



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			The development of a probation workforce strategy will set out the vision and high-level approach to ensure that the workforce is utilised as efficiently and effectively as possible.	Deputy Director and Head of Strategy, Probation Workforce Programme	March 2020
12	Improve data collection to support analysis of staff performance	Agreed	All Divisions will be required to report on NPS staff performance markings by protected characteristic. High level results are to be reviewed by NPS Senior Leader Team (SLT) annually.	Head of HRBP Function: NPS, HQ & Wales	July 2020
	management with a view to better understanding and addressing disproportionality		Staff are reminded each time they log onto SOP to declare/update their protected characteristics. This has recently been updated to include social Economic background data. A quarterly report is published on declaration rates and this can be supplemented by local Divisional level reports.	Chief Probation Officer and Executive Director for Women and Probation/Probation Divisional Directors	January 2020
			The NPS divisional SLTs will continue to share data on declaration rates and encourage staff completion. The MoJ People Group is to also consider commissioning a bespoke reporting tool to more effectively utilise SOP data, thus facilitating the above actions.	Head of HRBP Function/HR Services Strategy Manager, Service Improvement	January 2020
13	Review the role of the quality development officers to ensure that the role is effective and well understood	Agreed	The Probation Reform Programme Regional Structures Workstream has reviewed the need for Quality Development Officers (QDOs) and determined it being part of the model going forward. The QDO Managers will continue to attend team meetings, staff engagement events and briefings to promote the work and availability of the QDO team within each Division. As we move	Probation Reform Programme, Regional Structures Lead	Completed Ongoing – and to be completed by December 2021
			towards Regional structures being implemented they will work with incoming former CRC colleagues to ensure they fully understand the remit and services QDOs can offer them.		

	<u>Services</u>				
	HM Prison and Probation Service should:				
14	Have strategic oversight of commissioning arrangements and ensure that non-	Agreed	HMPPS intends to commission interventions which meet the key, frequently-occurring rehabilitative needs within the Probation caseload and to use the competition process to evaluate those where the service design clearly indicates that improved outcomes for individual service users will be secured.	Competition Leads (for Dynamic Framework and Probation Delivery Partner competitions),	August 2021
	accredited services meet the required standard.		HMPPS will also introduce regional Effective Interventions Panels which will assess relevant future rehabilitative interventions against the Correctional Services Accreditation and Advice Panel (CSAAP) principle for effective interventions.	Probation Reform Programme	August 2021
			HMPPS is developing a performance framework which will enable monitoring of the outcomes achieved in relation to the rehabilitative interventions delivered to individual cases.	Performance Lead, Probation Reform Programme	August 2021
			Within the Probation Reform Programme, HMPPS is designing a new regional probation structure and as part of this HMPPS are exploring what central support is required to enable data and evidence-based commissioning decisions.	Probation Policy Manager, Probation Reform Programme and Head of Whole System Learning, Whole System Development Group	August 2021
5	Increase opportunities for service user feedback	Agreed	 Service User Forums have been implemented in North East, Wales, London and South East and Eastern Divisions. Service User Forums are being set up in Midlands, North West and South West and South Central divisions. HMPPS also plan to roll out a mentor scheme across the NPS in the next financial year. 	Deputy Director, Business Strategy and Change / Head of Partnership and Contracts, Business Strategy and Change	Completed April 2020/202

A service user reward scheme has been approved and will be rolled out by September 2020.		September 2020
A national HMPPS service user initiative (SUI) Guide to Excellence and Tool kit is under development and currently informing and supporting improvements to Service User Involvement (SUI) in the NPS and prisons. The guide and tool kit will provide a library of learning products from across the system to support best access to the knowledge and expertise held by the people in our system, and will be available in late March 2020.	Senior Manager and Service Manager, Whole System Development Group	March 2020
There are a series of workstreams underway to establish SUI Activity in operational lines (NPS, prisons and others), and HMPPS HQ activity (i.e. service design / policy / commissioning) to identify areas of delivery into which service users typically provide evidence and insight, and priorities for work to support and enable this further.	Senior Manager and Service Manager, Whole System Development Group	December 2020
An analysis of the benefits of Service User involvement was completed in December 2019 and will form part of the wider toolkit available from late March 2020. A more extensive compendium of insights and evidence based on user consultation and involvement activities, including ways to identify trends, key messages and thematic findings will also be available as part of the toolkit and form part of the longer-term offer of wider insights/evidence from the Whole System Development Group to the wider business.	Senior Manager and Service Manager, Whole System Development Group	March 2020
Ongoing work is taking place to support and enhance the ways in which HMPPS articulates its commitment to involving the user voice in service design and delivery, e.g. joint work with the Probation Programme to clarify how we most effectively take account of the user voice in emerging performance and contractual considerations, as part of the design of the Unified Model.		December 2020
	Senior Manager and Service Manager,	

				Whole System Development Group	
16	Review the grade of the victim liaison officers	Agreed	The Probation Services Officer (PSO) role will see further review under the new workforce reform programme. Any future review of PSO role and the boundaries of activity against Band 4 PO roles will need to consider the implications for all role types.	Head of Capability, Workforce Reform Programme	December 2020
			A named person from within the reform programme will be identified to lead on the review of the victim service and the Victim Liaison Officer (VLO) role. This will include understanding the balance between regional and national resource and understanding the thoughts of our stakeholders and if there is too limited a scope [offence types included too narrow or the actual service offer to those in scope not broad enough]. Functions will be mapped across those delivered by other services to review if there are any conscious or unconscious duplications. Consideration will be given to the management of the above in terms of role function and banding.	Design Lead, Probation Reform Programme	September 2020
17	Ensure that HMPPS and Her Majesty's Courts and Tribunals Service establish equal access to court buildings and facilities	Partly agreed	This recommendation is partly agreed as whilst it is not in HMPPS's gift to complete this action alone, HMPPS will work with Her Majesty's Courts and Tribunals Services to ensure that operational sites where probation staff are based are provided with appropriate access to building and facilities.	Head of Estates, Business Strategy and Change	Completed and ongoing
	for NPS staff.		HMPPS will raise this at Director level in HMCTS to seek agreement in principle to appropriate access is secured. HMPPS will also check with Regional Probation Directors to see if issues have been resolved.	Executive Director, Wales	March 2020
	Information and facilities				

	HM Prison and Probation Service should:				
18	Develop a strategy for disseminating lessons learned from serious further offences	Agreed	The Serious Further Offences (SFO) team have already committed to collate information and publish (i) a bespoke report on common issues identified in the quality assurance of SFO reviews and (ii) national themes and learning identified in SFO reviews by the end of quarter four.	Head of Public Protection Group (PPG) / Head of SFO Team in PPG	March 2020
			In line with the principle of an open learning culture set out in the HMPPS Strategy in November 2019, HMPPS will formally set out the approach for disseminating learning by the end of March 2020. This will take into account the work that is already being done on disseminating learning from SFO reviews by the Effective Probation Practice Group and the NPS in Wales.	Head of Public Protection Group in PPG	March 2020
19	Review the potential for a system-wide approach to the review of serious further	Agreed	The OMiC Board have discussed this and recognise the potential value of reviewing the wider work which prisons do in preparation for release, but also recognise that this would require significant resource to implement.	Head of Public Protection Group	Completed
	offences, incorporating work that is done in prison and in preparation for release, in relevant cases		HMPPS have committed to update the SFO Probation Instruction setting out an interim approach to SFOs to reflect the changes brought about by OMiC. Reviewers will consider offender management in custody and appropriately liaise with relevant prison staff.	Head of Public Protection Group / Executive Director Performance	April 2020
			In the longer term HMPPS will consider an approach to SFOs which takes into account the wider work of the prison. HMPPS consider the most appropriate time to undertake this is after the OMIC case management system has been embedded so would not expect to start the work on reviewing this option before September 2020, to allow for the time between implementation of OMIC, the release of an offender and the commission of a SFO.	Head of Public Protection Group	July 2021
20	Issue clear guidance on the recording and classification of NPS complaints to ensure	Agreed	Work is underway to revise both the Probation Instruction (PI) on complaints and associated guidance. This will be completed before the end of the current financial year and will then be submitted for	Deputy Director Business Strategy and Change/ Head of	March 2020

	consistent practice and support service improvement		approval. This action will ensure consistency in the handling of complaints in each division.	Partnership and Contracts	
21	Ensure that data and learning from NPS complaints are routinely gathered, analysed and shared with divisions	Agreed	A comprehensive set of management information is reported to the National Probation Service Senior Leaders Team on a six-monthly basis. Management information on complaints is discussed at quarterly workshops to share learning and identify best practice. These workshops are hosted and chaired by the Head of Partnerships and Contracts and the Partnership and Contracts Lead, assisted by the Contracts Co-ordinator. Attendance at these include the NPS Divisional SPOCs, the Complaints Database Manager and the Service User Involvement Lessons Learnt Representatives.	Deputy Director Business Strategy and Change / Head of Partnership and Contracts	Completed
	Information and facilities The Ministry of Justice should:				
22	Implement a strategy to reverse the underinvestment in the NPS estate, with costs and timescales	Partly agreed	This recommendation is partly agreed as whilst the below indicates an intention (and a degree of resource) to start to address the question of long-term under-investment, the full achievement of this will require the securing of a long-term funding/ resource solution (beyond the lifetime of the Probation Programme) which cannot be guaranteed at this point. It should be noted that underinvestment across the MoJ Estate (including Probation) has been formally identified as one of the Department's key risks.	Chief Operating Officer, MoJ Estates supported by Head of Business Strategy and Change – Estates	Completed
			The Probation Estates Workstream includes consideration of under-investment/ maintenance (in addition to alignment of CRC/NPS operations/ staff). To oversee this at a regional level new Regional Estates Sub Boards (now established) will review local strategies and ensure proposals are developed to effective	Chief Property Officer, MoJ Estates	2020 – 2021 is the first year of delivery of what is a five year programme



			targeting of investment. In addition to this, work has commenced to understand the actions required to develop a strong investment strategy following the formal closure of this programme. This includes the identification of all lease event dates and the undertaking and assessment of property condition surveys		(under the governance of the Probation Reform Programme)
23	Ensure that the process for reviewing work orders in the facilities management contract prioritises public protection	Agreed	MoJ Estates (working in collaboration with NPS) have undertaken a range of developments to ensure the effective management of work orders. These include the significant investment in expanding the MoJ Estates FM Team to help manage and facilitate job prioritisation and management, and the review of the performance management options using the data held by KBR (the organisation that manages job work orders). This will aid local job prioritisation and management between the NPS Head and Estates FM Lead. This will enhance existing systems where job priorities which pose the greatest risk to public protection are identified by the business and escalated each month to MoJ Estates colleagues and the FM providers. This activity helps the business identify those issues that pose the greatest risk to: public safety, the safety of our staff and service users, and the ability for us to continue to work from an affected site. Specifically, work is in progress to ensure the creation of an effective reporting system regarding beds 'closed' within approved premises directly due to FM service failure. Work is also in progress to establish revised, clarified governance in relation to the Estates FM and NPS BSC functions.	Chief Operating Officer & Director MoJ / NPS operational liaison/ facilitation provided by NPS Head of Estates	April 2020
24	Develop and deploy a streamlined escalation process in relation to the facilities management contract, and monitor performance at each stage to support better service delivery and ensure that repairs are	Agreed	A renewed streamlined FM escalation process has been designed and implemented across the Probation estate. This renewed process transfers ownership away from front line NPS colleagues and places greater emphasis on the Estates FM Team to own and resolve escalated issues. This new process has been launched and is available on Equip for NPS colleagues to review. Further work is in progress to ensure all NPS staff are aware of the operation of the escalation process (e.g. via NPS News) to ensure compliance to the process and the avoidance of work-around escalations. This process is effectively a three-stage process	Chief Operating Officer, MoJ Estates	Completed

carried out to the required standard and an acceptable timescale.	which, once works have reached level 3, escalates them to the FM Manager to resolve in collaboration with the FM supply chain. A monthly process of feedback on escalations and resolutions between FM Managers and NPS is to be implemented. Meanwhile, each month, the Estates Directorate FM Director holds meetings with the Account Directors within the FM supply chain to hold FM suppliers to account for outstanding level 3 escalation works.	
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