



HM Prison &
Probation Service

Domestic Abuse HMIP Action Plan

Action Plan Submitted: 07th November 2018

A Response to the HMI Probation Inspection: Domestic abuse; the work undertaken by
Community Rehabilitation Companies

Report Published: 25th September 2018

Update Submitted: 28th June 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 plans 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 by HMI Probation via annual inspection.

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 must 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: Domestic Abuse Thematic Report (Community Rehabilitation Companies)

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
1	<p>The Ministry of Justice should:</p> <p>As part of the probation systems review, consider how to compel CRCs to focus on the quality of work with perpetrators and victims of domestic abuse.</p>	Agreed	<p>Action Plan November 2018</p> <p>New CRC contracts are expected to be implemented by the end of 2020. As part of the probation systems review, the Ministry of Justice has identified that it will want new providers to continue to deliver relevant accredited programmes for Domestic Abuse perpetrators. The review includes consideration of how to focus on the quality of services delivered through the new performance framework and maximising the number of eligible cases who undertake the Building Better Relationships (BBR) accredited programme. We will continue to mandate that all CRCs offer this programme. We will look at the use of the effective proposal framework to improve advice to sentencers by the National Probation Service (NPS) and targeting of accredited programmes. In addition, we are reviewing a range of contractual levers and performance levels to secure these outcomes.</p>	Deputy Director (Probation Review and Vulnerable Offenders team)	December 2020
			<p>Update June 2019</p> <p>The Ministry of Justice (MoJ) have published a response to the Probation systems review consultation. As part of this, the new contracted provision for delivery of Accredited Programmes' will include an expectation of ongoing provision of relevant accredited programmes for Domestic Abuse (DA) perpetrators. The review includes consideration of how to focus on the quality of services delivered through the new performance framework and maximising the number of eligible cases who undertake the Building Better Relationships (BBR) accredited programme.</p>	Deputy Director (Probation Review and Vulnerable Offenders team)	December 2020
			<p>As part of future arrangements under the Probation Review, all offenders, including DA perpetrators, will be managed by the National Probation Service. This will facilitate continuity of supervision, commencing in Wales in December 2019 and England in April 2021</p>	Deputy Director (Probation Review and Vulnerable Offenders team)	April 2021



			<p>HMPPS are updating and refocussing the national Effective Proposal Framework indicators, which are monitored to improve advice to sentencers by the National Probation Service (NPS) and targeting of accredited programmes. In addition, a range of contractual levers and performance levels to secure these outcomes are under review.</p> <p>The Domestic Abuse Bill was published on 21st January 2019 and is available on the Government website. This is the most comprehensive package ever released in relation to tackling Domestic Abuse in the UK and MoJ have committed to taking all reasonable measures within their power to protect victims and robustly intervene with perpetrators.</p>	<p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p>	<p>August 2019</p> <p>December 2020</p>
2	<p>Her Majesty's Prison and Probation Service should:</p> <p>Identify and disseminate an effective, integrated pathway for working with domestic abuse that takes account of the full range of domestic abuse contexts and the need to protect victims and children.</p>	Agreed	<p>Action Plan November 2018</p> <p>HMPPS will issue a new Domestic Abuse Policy Framework which will highlight expectations for working with domestic abuse perpetrators and set out access to interventions and referral routes including those aimed at protecting victims and children.</p> <p>Update June 2019</p> <p>Work on the Domestic Abuse Policy Framework is underway and a draft is due to be sent out for consultation by the end of June 2019. A single page visual representation of the pathway for working with offenders, referrals to interventions, and safeguarding victims and children will be provided by July 2019. Staff changes have delayed the publication of the framework but HMPPS are committed to progressing this and delivering a product that will strengthen work with domestic abuse perpetrators and improve safeguarding of victims and children.</p>	<p>Head of Public Protection Group</p> <p>Head of Public Protection Group</p>	<p>June 2019</p> <p>November 2019</p>



3	Introduce and promote a system across England and Wales to evaluate and legitimise domestic abuse interventions and provide assurance that HMPPS and CRC interventions are evidence-based.	Agreed	<p>Action Plan November 2018</p> <p>The Ministry of Justice (MoJ) and Her Majesty's Prison and Probation Service (HMPPS) promote the importance of using evidence to inform interventions and already have a system in place to facilitate evidence-based practice across CRCs, the NPS and prisons. MoJ use the Correctional Services Accreditation and Advice Panel (CSAAP) to provide assurance that HMPPS and CRC interventions are evidence based.</p> <p>The Building Better Relationships (BBR) programme, the main Domestic Abuse programme mandated for CRC delivery, is CSAAP accredited. MoJ are developing a set of CSAAP approved standards to guide the quality of other interventions that may not be suitable for full accreditation.</p> <p>HMPPS has produced good evidence for community domestic violence programmes which target those who are at medium or high risk of reoffending. The BBR intervention is a replacement for earlier programmes. BBR is based on a similar evidence base and draws on the identified strengths and research base of Integrated Domestic Abuse Programme (IDAP) and Community Domestic Violence Programme (CDVP). HMPPS and MoJ are committed to evaluating BBR and plans are in place to start work in 2019/20 to establish the most appropriate evaluation approach. MoJ routinely publishes findings from research they have commissioned and the results from the evaluation of BBR, once available, will be published on the government website.</p>	Deputy Director, (Prison and Probation Analytical Services)	June 2019
			<p>Update June 2019</p> <p>Feasibility work to assess the most appropriate methodological approach for conducting an evaluation, to assess the impact of BBR on proven reoffending has commenced. The feasibility study and recommendations are planned to be delivered by the end of 2019/20.</p> <p>The principles that underpin the Effective Intervention Panel (EIP) pilot, have been shared with some CRC's to support improvements in their internal evaluation process. These principles have been piloted in Wales Division (NPS) and a potential early adopter site in England has been identified. Learning from these pilot sites will help to inform system design for the oversight of non-accredited interventions for the future Probation contracts.</p>	Deputy Director, (Prison and Probation Analytical Services)	March 2020
				Deputy Director (Probation Review and Vulnerable Offenders team)	December 2020



4	Community Rehabilitation Companies should make sure that: Responsible officers have the right training and support to identify and manage the risk of harm posed by perpetrators of domestic abuse.	Agreed	Action Plan November 2018 CRCs accept the importance of domestic abuse (DA) training and where gaps exist, plans are in place to increase/improve arrangements. Contract management teams (CMTs) will carry out assurance checks to ensure improved training arrangements are put in place. CRCs are continuing to develop their Quality Assurance Frameworks and CMTs are monitoring delivery of QA activity on a quarterly basis. CRCs will be expected to evidence their approach to managing the risk of harm posed by DA perpetrators and the systems in place to support Responsible Officers (RO) in this work.	CRC Chief Executive Officers / CRC Contract Management Team	April 2019
			Update June 2019 All CRCs have provided additional DA training for staff including Spousal Assault Risk Assessment, Safeguarding and general risk management training. DA is included in induction training for new staff across all CRCs. The majority have also completed best practice workshops. New guides and revised DA policies/strategies have been launched where deemed appropriate by the CRC Chief Executive Officer. Local Contract Management Teams (CMT) continue to monitor the level of training completed.	CRC Chief Executive Officers / CRC Contract Management Team	Completed
			All CRCs now have Quality Assurance (QA) processes in place and audits to cover key themes including DA. There is also a significant rise in enhanced management oversight and the use of DA competency checklists for staff and managers. Local CMTs have also designed local compliance exercises to check improvements.	CRC Chief Executive Officers / CRC Contract Management Team	Completed and ongoing



5	Domestic abuse cases are flagged appropriately on their information management systems to provide an accurate national picture of domestic abuse cases managed by CRCs.		<p>Action Plan November 2018</p> <p>The CMT function continues to develop assurance exercises. CMT risk management monitoring includes checks to ensure consistent use of DV (Domestic Violence) flags to highlight DA cases. Where risk management is found to be insufficient, contractual remedies will be used.</p>	CRC Chief Executive Officers / CRC Contract Management Team	December 2018
			<p>Update June 2019</p> <p>CMT assurance checks have shown that the use of DA flags continues to be inconsistent. This is in line with overall concerns in relation to case recording practice across almost all CRCs. Although there are some examples of improvement activity in internal QA processes, including the use of prompts and the checking of flags, this remains an area of concern. CMTs are monitoring risk management practice through the use of Continuous Improvement Plans and Action Plans (including checks to ensure consistent use of DV (Domestic Violence) flags to highlight DA cases). This will remain a priority area for CMTs over the next year.</p>	CRC Chief Executive Officers / CRC Contract Management Team	Completed and monthly
6	Service users complete appropriate, evidence-based interventions in a timely way, and that these interventions are delivered effectively and safely.	Agreed	<p>Action Plan November 2018</p> <p>All CRCs deliver the Building Better Relationships (BBR) accredited programme to DA perpetrators with a requirement attached to their community order or licence. The CMT function is currently developing a new Management Information report to monitor waiting times to drive improvements. We are also monitoring the use of Delius flags to check that CRCs are targeting their interventions appropriately. The Accredited Programmes Interventions Integrity Framework ensures the delivery of BBR is both safe and effective.</p> <p>The delivery of Rehabilitation Activity Requirements (RAR) is currently being reviewed by HMPPS. The Agency is working to deliver a range of improvements including the publication of operational guidance. In addition, some CRCs are looking for accreditation of their RAR DA interventions from external bodies, for example Wales CRC are working with Wales Effective Engagement Panel and Durham Tees Valley CRC are seeking independent accreditation.</p>	CRC Chief Executive Officers / HMPPS Whole System Improvement Team / CRC Contract Management Team	December 2018
			<p>Update June 2019</p> <p>HMPPS are updating and refocussing the national Effective Proposal Framework indicators, including to monitor the percentage of those potentially eligible for BBR that have it proposed to court.</p>	Deputy Director (Probation Review and Vulnerable Offenders team)	August 2019



			<p>BBR continues to be delivered across all CRCs and the CMT developed Management Information (MI) is helping to hold CRCs to account for their waiting lists at monthly contract meetings. Nationally, offenders commencing BBR within the first six months of their order has increased from 68% to 75% since the MI was introduced. The Accredited Programmes Interventions Integrity Framework (IIF) tests programme delivery against accreditation standards. The IIF will continue to be used in relation to all accredited programmes following the probation systems review, including to test delivery of BBR by Innovation Partners.</p> <p>A Rehabilitation Activity Requirement (RAR) improvement action plan has been developed, and as part of this plan, Authority expectations about the development and delivery of RAR activities will be set out. Refreshed RAR guidance and updates to the RAR PI will be used to describe these expectations. These are currently in draft and in consultation with MoJ Legal and Commercial before progressing through HMPPS governance.</p> <p>The following planned activities to improve the recording of RAR activity days are also on target for implementation in September 2019;</p> <ul style="list-style-type: none"> • Changes will be made to N-Delius to support accurate recording. • Prison & Probation Analytical Services have developed a Management Information report to track the recording of RAR activity days. It is hoped that this can be made available for all CRC's and NPS to access. <p>The Probation Programme has published its response to the 'Strengthening Probation' consultation which can be found on the Government website. This includes overall design intention for the RAR, including the core suite of interventions to be available from the market. Market engagement is underway as are planned stakeholder engagement events with operational NPS and CRC staff. The updated RAR guidance and PI will both support future design intent. Learning from EIP pilot sites will inform system design for the oversight of non-accredited interventions through future Probation contracts.</p>	<p>CRC Chief Executive Officers / CRC Contract Management Team</p> <p>Deputy Director, Whole System Development Group</p> <p>Deputy Director, Whole System Development Group</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p>	<p>Completed and quarterly</p> <p>September 2019</p> <p>September 2019</p> <p>Completed and ongoing</p>
7	Victims, including children, are protected and supported sufficiently for the duration of a case, and there is an appropriate response to all new	Agreed	<p>Action Plan November 2018</p> <p>The CMT has identified management of the risk of harm as a key area to monitor and report on and a range of activity has been put in place including the development of new Management Information reports and case file checks. Where risk management is found to be insufficient, contractual</p>	<p>CRC Chief Executive Officers / CRC Contract Management Team</p>	<p>December 2018</p>



information about risk of harm.	<p>remedies will be used. Our risk management monitoring includes the following DA checks:</p> <ul style="list-style-type: none"> • Checks to ensure DA and safeguarding information has been obtained from the Police/local authority • Spousal Assault Risk Assessments have been completed on all DA cases • The sufficiency of risk assessment and risk management plans • That risk is reviewed following a significant change of circumstances <p>In response to this report, CRCs have put in place a number of improvements including:</p> <ul style="list-style-type: none"> • reviewing their Public Protection Policy • undertaking quality assurance on safeguarding • delivering additional safeguarding training • inclusion of safeguarding on supervision templates • internal safeguarding publicity campaigns to improve the awareness of all staff. <p>CMTs will monitor CRCs individual plans to ensure the proposed actions are completed.</p>			June 2019
	<p>Update June 2019</p> <p>As part of future arrangements, all offenders, including DA perpetrators, will be managed by the National Probation Service. This will facilitate continuity of supervision and streamline processes for risk assessment, commencing in Wales in December 2019 and England in April 2021.</p> <p>All CMTs have now completed compliance work in relation to CRC risk management practice. This continues to show that safeguarding and DA checks are inconsistent. CRC leadership teams are continuing to put improvements in place but these are not always translating into discernible improvements in DA operational delivery. During the exit phase from the current CRC contracts, delivering safe services that protect the public has been identified as a priority area for CMT activity. HMPPS has put in place a governance structure to manage risks and contingencies during this period including an Operational Delivery Sub-board (monthly) and Stabilisation & Strategy Sub-board (monthly) that will specifically monitor risks to contract delivery.</p>	<p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>CRC Chief Executive Officers / CRC Contract Management Team</p>	<p>April 2021</p> <p>Completed and monthly.</p>	



8	Partner Link Workers have the time and support to fulfil their duties effectively.	Agreed	<p>Action Plan November 2018</p> <p>CRCs accept the need to resource the Partner Link Workers (PLW) role sufficiently and a number have increased the number of PLWs and/or changed their delivery models to increase the available PLW resource. CRCs also recognise that staff awareness of the PLW role is critical and many CRCs are relaunching the service, simplifying the referral processes and setting in place performance frameworks to monitor delivery against the PLW Manual. CMTs will monitor these developments and encourage CRCs to provide dedicated support/clinical supervision for the PLW role.</p>	CRC Chief Executive Officers / CRC Contract Management Team	December 2018 June 2019
			<p>Update June 2019</p> <p>All CRCs have reviewed their resourcing of the Partner Link Worker role. In some cases, this has meant providing dedicated PLWs where these roles were previously combined and in some other CRCs additional staff have been recruited. For example, London CRC have commenced recruitment of Domestic Abuse Support Advisors (DASA). A number of CRCs have reviewed the line management arrangements for PLWs and put greater support/ clinical supervision in place. The PLW role is being promoted at workshops and forums both in CRCs and the NPS.</p> <p>Under the Probation Review, Innovation Partners will be required to ensure sufficient resource is provided to enable the quality delivery of the Partner Link Worker role, including the provision of appropriate line management support.</p>	<p>CRC Chief Executive Officers / CRC Contract Management Team</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p>	<p>Completed</p> <p>April 2021</p>

