

Action Plan Submitted: 28/02/2020

A Response to the HMI Probation Inspection: Derbyshire, Leicestershire, Nottinghamshire and Rutland CRC

Report Published: 03/03/2020

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 HMPPS website.

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 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: DLNR

	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
t i	DLNR CRC should: Ensure when new cases are started and allocated, account is taken of the information available concerning risk of	Agreed	Derbyshire, Leicestershire, Nottinghamshire and Rutland (DLNR) CRC will ensure the collation of all available risk of harm and risk of reoffending information at the first opportunity, by working towards aligning National Probation Service (NPS) and Community Rehabilitation Company (CRC) allocation processes.	Customer Service Centre (CSC) Lead	April 2020
	harm and risk of reoffending		 DLNR CRC will improve overall assessment quality by reviewing and analysing case audits already undertaken, identifying key areas of concern in assessments, and clusters where this is indicated to be prevalent. This analysis will drill down to cluster, team and individual level. DLNR CRC will independently benchmark expectations around good practice and quality assessments. It will take a targeted and strategic approach to learning and development inputs, focusing specifically on how information should be used and acted on in assessments, and making use of ongoing coaching, addressing gaps or poor performance to ensure learning has embedded, as identified by the analysis process and benchmarked expectations. DLNR CRC will use a mixture of training inputs, reflecting diverse staff group and adult learning styles. To ensure training inputs are embedded it will create an ongoing reflective practice 	Inspection and Quality Lead	July 2020



framework which will incorporate facilitated peer group discussions and side by side case auditing with Probation Delivery Managers. A continual professional development section in supervision, and a refreshed supervision approach, will focus on reflective practice, demonstrating how the practitioner is putting learning into practice, and the identification of any continuing gaps in their knowledge.		
DLNR CRC will improve safeguarding checks by moving from a centralised system to checks occurring in local clusters. DLNR CRC will instigate new procedures by identifying partnership Single Points of Contact (SPOC), and clear local CRC ownership, with locally based administration relocated from the central customer service centre. This will ensure closer communication directly with offender managers and the ability to build local relationships with partnerships in clusters through a consistent and known process.	Regional Head and CSC Lead	April 2020
DLNR will improve local partnership arrangements in clusters by working with NPS colleagues to ensure all areas have clear information sharing and pathway arrangements in place relating to risk. This will be evidenced through the ongoing independent case audit activity and a reflective practice framework. It will prioritise domestic abuse and safeguarding interfaces to strengthen local connections and partnership work.	Deputy Cluster Heads	March 2020
DLNR will maximise administrative support, including telephony, to operational staff, through the restructure of administrative support, to ensure officers have the time to follow up available risk information at the start of the Order.	CSC Lead	March 2020

			 Implementing process change in allocations where appropriate, in-line with NPS processes, and ensuring this is in-line with transitions planning. Requiring evidence that clear, local arrangements between the CRC and NPS and Partnerships is in place, showing how pathways, information sharing and strategic direction are being utilised. Confirmation that all centralised call handlers are in local offices to maximise administrative support. 		
2	DLNR CRC should: Improve the capacity and skills of senior probation officers (known as performance delivery managers in DLNR), to provide high-quality management oversight, so that risk of harm is managed well in relevant cases	Agreed	DLNR will help Probation Delivery Managers (PDMs) to focus on case discussions with officers, shifting the main focus of these discussions to assessment, analysis and actions relating to risk of harm, rather than performance targets. It will support PDMs with further development in coaching and mentoring skills. This will be achieved by reviewing current expectations of one-to-one and group supervision, and mirroring elements of the SEEDS 2 supervision and practice approach in-line with the NPS delivery model, specifically embedding the 'Contact, Review, Intervention, Summarise and Set task' (CRISS) model to improve all case recording.	Learning and Development (L&D) Lead	April 2020
			DLNR CRC will support PDMs in identifying new organisational benchmarks around quality and public protection, by undertaking a CRC-wide benchmarking activity led by an independent resource with inspection expertise. As part of this benchmarking analysis each Probation Manager's skillset in overseeing and supporting effective case management and public protection will be reviewed. Following this DLNR CRC will tailor appropriate inputs and support to ensure PDMs understand and are applying these benchmarks across the CRC. There will be ongoing work with PDMs to support them in	Inspection and Quality Lead	July 2020

developing the correct skills to support their teams through training, the reflective practice framework and facilitated action learning sets. This will be reviewed through a revised supervision template to be completed by regional managers with PDMs and which focuses on Continued Professional Development and the embedding of learning into practice.		
DLNR will look at additional administrative support for PDMs to remove non-public protection or case management activity from their remit as far as possible, to give them the time and space to focus on keeping people safe. This will include the creation of a new management administrative support team within the CRC, mirroring National Probation Service (NPS) pilots in this area. DLNR CRC will review and revise existing administrative processes sitting within corporate functions.	Director of Operations	April 2020
DLNR CRC will support PDMs who identify training or capability gaps in teams, identified through the monthly case audit regime and revision of supervision practice, to focus on case discussion and risk management, by providing additional resources to deliver industry standard workshops in keeping people safe. There will be ongoing work with PDMs to support them in developing the correct skills to support their teams through training, the reflective practice framework and facilitated action learning sets.	Deputy Cluster Leads	July 2020
DLNR will deliver 'professional curiosity' and other prioritised skills training (Think Victim, and Active Case Management, CRISS, risk management planning, and recall and breach) through collaboration with the NPS to all staff who require this. DLNR will ensure actions are completed and measure the impact by:	Deputy Cluster Leads	July 2020

		 Benchmarking current performance in: Manager oversight quality, overall case audit scoring, appropriate allocation of cases by PDMs, appropriate oversight and adherence to transfer processes, risk reviews undertaken with staff, specific performance indicators relating to risk management e.g. outstanding home visits. Setting a trajectory for improvement. Creating a monthly score card and case audit analysis report, demonstrating progress against the initial benchmarking and trajectory expectations. Requiring PDMs to provide evidence to Cluster Heads that agreed supervision processes are being undertaken in their teams. Ensuring a timely response is made to requests for capability and training needs. 		
DLNR CRC should: Provide a mechanism for organisational and individual staff learning and development needs to be captured and addressed	Agreed	DLNR will develop its learning offer so all new staff receive intensive input to ensure that the golden thread of keeping people safe flows through the management of a sentence. It will do this by ensuring that all new starters, and those from the past 2 years, are provided more intensive Offender Assessment System (OASys) and risk assessment training (with a particular focus on risk management plans). DLNR CRC will address the gaps in the knowledge and skills of the wider staffing group, identified through the case audit analysis, by delivering 'professional curiosity' and other prioritised skills training (Think Victim, and Active Case Management, CRISS, risk management planning, and recall and breach) through collaboration with the NPS, thereby building on work to embed a more investigative approach in Reducing Reoffending Partnership's (RRPs) offender management, and embedding this learning through the	Cluster Deputy Leads Cluster Deputy Leads	March 2020 July 2020

reflective framework. It will align with transitions work in this area, ensuring CRC staff are properly prepared for increased public protection risk work.		
DLNR will embed newly qualified learning by ensuring all recently qualified PQiPs (trainee Probation Officers) access the newly qualified officer training delivered by the NPS.	L&D Lead	Ongoing
It will support learning and the embedding of this into practice through the recruitment of Quality Development Officers (QDO) and collaborating with the NPS in this initiative.	L&D Lead	April 2020
DLNR CRC will develop professional conversations and peer learning in relation to the management of risk, through themed facilitated practitioner forums which will be held bi-monthly. Case examples will be taken from good practice examples found through independent case audits, demonstrating the ability to achieve this and stimulating conversation with offender managers around complex case issues. Themes will be set from SFO learning and analysis of case audit reviews, enabling a strategic response to priority areas to be developed.	Cluster Deputy Leads	July 2020
DLNR CRC will open up development and learning opportunities for experienced Probation Service Officers (PSOs) to become Probation Officer qualified practitioners, by working with the NPS to develop a pathfinder programme, enhancing existing skills and promoting a positive learning culture. Experienced PSOs who do not wish to follow this pathway will have access to the training inputs as described throughout this response.	Regional Head	April 2020
DLNR will ensure all external training opportunities, for example those offered by Safeguarding Boards and Police MARAC	Cluster Deputy Leads	April 2020

training, are available, advertised and attended by DLNR staff, expanding the risk understanding of its officers into wider partnership areas.	
It will provide leads from the CRC to participate in the NPS Effective Practice forum and disseminate learning from this into team briefings, ensuring emerging themes are captured and responded to.	
 DLNR will ensure actions are completed and measure the impact by: Building a requirement in supervision for officers to discuss and demonstrate how recent training has impacted on their practice. Ensuring newly qualified and new staff attend the required training provided, by tracking this organisationally and requiring PDM sign-off once completed. This will be built in to a monthly scorecard to ensure visibility. Evidence of practitioner forums in-place across clusters / teams, with attendance mandated. Recruitment of additional QDO roles to support delivery and development. Build into supervision a process for Continuous Professional Development, with evidence of at least one externally attended training input per officer per year. Successfully delivering a pathway programme for experienced PSOs to qualify as Probation Officers (POs). Evidence of learning translating into practice demonstrated in monthly case audit analysis. 	



4	DLNR CRC should: Provide unpaid work supervisors with access to the CRC email and case management system	Partly agreed	 While DLNR CRC recognises that improvements would be beneficial in this area, information security requirements and financial constraint mean this recommendation is not entirely viable in the way it understands the recommendation to have been made. DLNR CRC would, for example, be unable to provide all unpaid work supervisors with a laptop for remote working. DLNR CRC will however endeavour to meet the principles of this is recommendation by: Reviewing current systems for communicating with supervisors, identify where improvements are required and assess the feasibility for implementing appropriate changes. This report will present its finding to the DLNR Operations Board. The review will include: Looking at the way business communications are currently shared e.g. organisational updates and team plans, to improve the visibility of these for unpaid work supervisors. Looking at the way employment communications e.g. shift changes or policy changes are currently shared, to improve the timeliness and visibility of these for unpaid work supervisors. Reviewing the way operational communications, e.g. risk information, is shared with unpaid work supervisors, ensuring that processes adhere to Information security regulations whilst keeping people safe. 	Head of Community Payback	June 2020
			 Setting a focus for the review to consider what information needs to be communicated and how effective, efficient and secure current systems are and whether improvements 		

			 need to be made. In all cases electronic methods of communication will be specifically considered. Ensuring the review includes the views of managers, office based staff and supervisors to meet the needs of unpaid work supervisors whilst balancing business and information security risks. Sharing changes to processes and the improved outcomes of this following review. 		
5	DLNR CRC should: For relevant cases, provide access to Education, Training and Employment services for people completing an unpaid work requirement.	Agreed	 DLNR CRC accepts the importance of Employment, Training, Education (ETE) in desistance from offending, and will therefore seek to maximise, where appropriate, ETE provision for those undertaking an Unpaid Work (UPW) requirement. It will maximise the access and take up of ETE for unpaid work cases which are suitable, by reviewing its current referral performance by team, and setting improvement targets to be achieved. This will be measured through our monthly scorecard. DLNR will improve the understanding of 'suitable cases' by clarifying criteria for referral with offender managers and UPW teams, to raise the profile of such cases. It will review the recording of ETE activity in light of the broader definition included in the new Community Payback (CP) Guidance manual, to increase scope of suitability. It will ensure actions are completed and measure the impact by: Benchmarking its existing performance in this area. Setting a trajectory for improvement. 	Head of Community Payback	June 2020

			• Creating a monthly score card and case audit analysis report, demonstrating progress against the initial benchmarking and trajectory expectations.		
6.	DLNR CRC should: Ensure that the quality of assessment, planning, service delivery and reviewing is improved, to help keep actual and potential victims safe, drawing on individuals and their support networks, and contingency planning for when	Agreed	 DLNR will maximise public protection outcomes by aligning NPS and CRC partnership arrangements, and improving local partnership approaches by working with NPS colleagues to ensure all areas have clear information sharing and pathway arrangements in place around risk. It will prioritise domestic abuse and safeguarding interfaces to strengthen local connections and partnership work. DLNR CRC has outlined it approach to assessment and how it will address deficiencies in this area including ongoing oversight and a continual improvement cycle. DLNR CRC will address the additional Domain 2 (Case Supervision) areas as follows: 	Cluster Deputy Leads	April 2020
	things change. This recommendation has been repeated from the previous inspection.		Planning: DLNR CRC will ensure planning is sufficiently focused on areas relating to risk of harm and public protection, by setting expectations around risk management plans and initial sentence plans to promote good practice, and using the training and embedding process as described previously. It will ensure partnership activity is included in these plans by ensuing strengthened local partnership links, and revisiting expectations around sharing plans where there are safeguarding or public protection risks. It will align National Probation Service (NPS) and CRC partnership arrangements, improving local partnership approaches by working with NPS Colleagues to ensure all areas have clear information sharing and pathway arrangements in place around risk. DLNR CRC will prioritise domestic abuse and safeguarding interfaces to strengthen local connections and partnership work.	Inspection and Quality Lead; Cluster Deputy Heads	July 2020

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	Delivery: DLNR CRC will improve the delivery of services to address public protection concerns, by revising home visits guidance, focusing on good practice examples from partnership agencies such as social services. It will use the reflective practice framework to ensure officers are talking about how home visiting can be used to address keeping people safe, promoting learning from each other and live examples. It will look at the quality of sentence planning sequencing and delivery, making sure a focus on risk of harm is the priority area in all cases.	Inspection and Quality Lead; Cluster Deputy Leads	July 2020
	Reviewing: DLNR will improve its reviewing practice by changing the focus of supervision with offender managers from a performance led meeting to a case and risk review discussion, thereby ensuring cases are being reviewed at more regular intervals jointly by offender managers and their PDM. DLNR will set increased frequency for PDMs to meet with offender managers. It will build professional curiosity by embedding facilitated peer discussion on areas such as what constitutes significant changes. It will undertake an exercise with offender managers focusing on discussion of serious further offences and victim summary reports, to ensure learning does not remain theoretical but rather becomes "Live" to actual offender management practice. DLNR will drive uptake of required actions through wider and more holistic manager oversight inputs, ensuring the whole case is reviewed rather than single focus actions. It will ensure that through the continued case audit programme it monitors the appropriateness, quality and relevance of reviews, including progress against the supervision plan.	Inspection and Quality Lead; Cluster Deputy Leads	July 2020
	DLNR will seek to maximise resources to support Offender Managers and PDMs managing risk by working with Multi-	Cluster Deputy Leads	April 2020

Agency Safeguarding Hub (MASH) services in each geographical cluster, and by seconding Reducing Reoffending Partnership (RRP) staff, to expedite and improve the quality of information flow in respect of safeguarding and domestic abuse. It will take a strategic approach to gaps in public protection work, analysing themes and issues through the use of an independent resource with inspections experience, and then ensuring that it tailors its response to findings at team and cluster level, addressing the most significant and serious issues first. As a start DLNR CRC will refresh and reissue its 'Every Case' essential guidance, with a focus on public protection and risk management.	Inspection and Quality Lead	July 2020
DLNR will address gaps in staff knowledge and skills by delivering 'professional curiosity' and other prioritised skills training (Think Victim, and Active Case Management, CRISS, risk management planning, and recall and breach) through collaboration with the NPS, thereby building on work to embed a more investigative approach in RRPs offender management. This will be measured through the ongoing case audit programme and the reflective practice framework	Cluster Deputy Leads	July 2020
DLNR CRC will develop professional conversations and peer learning in relation to the management of risk through themed, facilitated practitioner forums which will be held bi-monthly. Case examples will be taken from good practice examples found through independent case audits, demonstrating the ability to achieve this and stimulating conversation with offender managers around complex case issues. Themes will be set from SFO learning and analysis of case audit reviews, enabling a strategic response to priority areas.	Inspections and Quality Lead	July 2020

DLNR will introduce a 'Keeping people safe' checklist to ensure minimum actions are taken in this area for all cases. The implementation and impact of this will be measured through the monthly scorecard.	Cluster Deputy Heads	March 2020
DLNR will ensure information gathered in prisons and by Through the Gate teams is shared and used, by reviewing Through the Gate processes and their connection with community teams.	Through the Gate Leads	March 2020
It will develop its learning offer so all new staff receive intensive input to ensure that the golden thread of keeping people safe flows through the management of a sentence. It will do this by ensuring that all new starters in the past 2 years, are provided with more intensive OASys and risk assessment training (with a particular focus on risk management plans). DLNR CRC will take a strengths-based approach, looking to promote good quality work and build on continued learning through the embedding of the reflective practice framework This training will be embedded through the reflective practice framework described previously and the identification of suitable mentors whose work has been highlighted of good quality through independent case audits	Cluster Deputy Heads	December 2020
 It will ensure actions are completed and measure the impact by: Benchmarking current performance in: the delivery of sentence plans and risk management plans; reviews of assessments and appropriate actions following changes in circumstances or new information; the accuracy and relevance of risk flags and reviews; home visits being undertaken; evidence of partnership working to address risk, including evidence of (Multi-Agency Risk Assessment Conference (MARAC) attendance, MASH and Integrated Offender management (IOM) when appropriate. 		

7		Agreed	 Benchmarking against risk escalation cases and timely transfer process, any actions specifically relating to the management of risk of harm and reoffending, evidence of the completion of the keeping people safe checklist. Setting a trajectory for improvement. Creating a monthly score card and case audit analysis report, demonstrating progress against the initial benchmarking and trajectory expectations. Evidence of increased information sharing following MASH links. Ongoing 'mini' inspections to independently evaluate improvement against activity undertaken, including one specifically focused on custodial and Through the Gate cases. Increased good and sufficient ratings for case audits against initial benchmark. Evidence of cross team auditing to increase benchmarking assurance. All staff to have received 'Keeping people safe' input. Analysis of case audit findings to be reviewed monthly at RRP Operations Board and Contract Management meetings. Increased contact with resettlement teams and use of prison assessments evidenced in case audits. Evidence of local protocol for information sharing and pathways with partners available in each cluster. Evidence of learning and professional discussions embedded into practice in supervision notes and through practitioner forum feedback. 	Public Protection	July 2020
7	DLNR CRC should: Provide enough staff and equip them with the knowledge and	Agreed	DLNR will prioritise the right actions to keeping people safe by setting a clear plan of work for the CRC Public Protection Group to identify the actions needed, following feedback from case	Public Protection Lead; Inspections and Quality Lead	July 2020

skills to carry out effective work to keep other people safe. This recommendation has been repeated	audit analysis, SFO learning and training gap analysis undertaken by the independent benchmarking and gap analysis. As described previously, DLNR CRC will then devise a strategic and prioritised response plan to address identified areas of concern.		
from the previous inspection.	It will retain a focus on emerging themes and share joint learning by merging the SFO learning and public protection forum approaches across all probation providers in the Midlands, and investigate options around cross-organisational forums with the NPS.	Public Protection Lead	April 2020
	DLNR CRC will continue to address absence by maintaining its work on health and wellbeing, ensuring trends and emerging issues are tracked by a new IT system, 'HR access'. This will allow trends and emerging issues to be identified, ensuring proactive and positive responses rather than reactive responses.	HR Lead	June 2020
	DLNR CRC will support managers to manage absence positively by providing continued absence management training and HR support for complex cases.	HR Lead	March 2020
	DLNR CRC will maximise skills and expertise in the CRC by delivering a secondment programme with NPS Midlands and by advertising relevant vacancies in both organisations. This will seek to address both skills and staff shortage gaps, reducing workload and seeking to address stress within staff groups.	Director of Operations	March 2020
	DLNR CRC will build resource and capacity in strategic posts by seconding management and senior leadership posts to support transitions and improvements, taking this requirement away from Middle managers, thereby creating time for them to focus on public protection activities.	Director of Operations	March 2020

			DLNR CRC will look for opportunities to support transitions work and maximise resources by creating secondment opportunities between the CRC and NPS for practitioners to help with workload, knowledge transfer and to promote opportunities and retention.	Director of Operations	July 2020
			It will look for opportunities to support transitions work and maximise resources by creating secondment opportunities between CRC and NPS for practitioners to help with workload and knowledge transfer. Initial reviews indicate some capacity within NPS workload in some areas. This activity will be aligned with transition planning		
			 DLNR will ensure actions are completed and measure the impact by: Ensuring secondments are in place. Ensuring roles are advertised across both organisations. Addressing team size inequalities for PDMs. Addressing caseload inequalities where possible using the average caseload tool to benchmark and track. 		
8	The Ministry of Justice should: Make clear how Through the Gate services will be delivered to support resettlement planning and pre- and post- release in the future	Agreed	HMPPS recognises that preparation for release is a core part of probation work. It requires an understanding of the challenges of transition from prison to community. The new probation model provides the opportunity to integrate 'Through the Gate' roles, processes and products with Sentence Management, aligning delivery to an individual's presenting risk. The model enhances one-to-one tailored support to individuals while in prison, enabling safer, better- planned, transparent, measurable and sequenced approaches	Director, HMPPS Probation Reform Programme	February 2020

arrangements for	for all those released from prison. It will also allow HMPPS to	
probation services.	remove duplication of roles and tasks between 'Through the	
	Gate' and Sentence Management in prison and the community.	
	HMPPS will invest in place-based services post release in the	
	locations where service users are released to - not just where	
	the prison is based. The new model will provide a single	
	accountable person with a single sentence plan to oversee and	
	coordinate all services pre- and post-release from prison into	
	the community.	
	the community.	
	A core set of services will be provided in prisons in the future	
	(advanced benefits claims, family services, health, and services	
	that address needs around education, training and	
	employment). Other services to promote rehabilitation,	
	reparation, reintegration and social inclusion will be provided	
	and delivered either through Probation Practitioners, regional	
	co-commissioning arrangements between probation, prison and	
	other local commissioners (Police and Crime Commissioners;	
	Clinical Commissioning Groups), the Dynamic Framework and	
	Probation Delivery Partners. This mix of provision and	
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	providers, which supports resettlement and use of release on	
	temporary licence for change work, will offer a local package of	
	interventions designed to improve the outcomes for those	
	leaving prison.	
	The new resettlement model will:	
	 Identify and access the right services per person and do this 	
	in a timely way, before release.	
	 Ensure services are delivered in the right place and at right 	
	time.	
	 Build professional relationships with individuals before and 	
	after release so there is continuity of support and a bridge	
	between prison and community. Consider an individuals'	

 risk, need, strengths and wider lifestyle circumstances for resettlement. Use the enhanced pre-release time to engage with the prison and other statutory agencies (safeguarding, Multi Agency Public Protection Arrangements, police, victim liaison) to ensure control and close monitoring is put in place, as required. 	
Further detail will be set out in the HMPPS Target Operating Model, which will be published in February 2020.	

