

Action Plan Submitted: 28 February 2020

A Response to the HMI Probation Inspection: Staffordshire and West Midlands CRC

Report Published: 5 March 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 <b>mus</b> 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 <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: SWM

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
1	Improve the quality of assessment, planning, service delivery and reviewing to help keep actual and potential victims safe.  This recommendation has been repeated from the previous inspection.	Agreed	Staffordshire and West Midlands CRC (SWM CRC) will ensure the collation of all available risk of harm and risk of reoffending information at the first opportunity and associated activity in the following ways:  **Assessment:* SWM CRC will improve overall assessment quality by reviewing and analysing case audits already undertaken, identifying key areas of concern in assessments and key areas where this is indicated to be prevalent. This analysis will break down information to cluster, team and individual level and independently benchmark SWM expectations around good practice and quality assessments. The review and analysis will take a targeted and strategic approach to learning and development inputs and ongoing coaching addressing gaps or poor performance in assessments. It will use a mixture of inputs reflecting diverse staff group and adult learning styles. To ensure training inputs are embedded an ongoing reflective practice framework will be created 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 putting learning into practice and the identification of any gaps in knowledge.  SWM CRC will set a series of monthly independent case audits assessing the impact of learning and development inputs, improvement in quality and the inclusion and acting on key pieces of risk information.	Inspection and Quality Lead  Cluster Heads	July 2020 May 2020

SWM CRC will ensure routine checks for child safeguarding and domestic abuse are undertaken at the first opportunity by localising these checks to each team. Each team will have a dedicated SPOC to ensure this action is taken and passed to Offender Managers, building links with partnership agencies and providing this information to speed up processes through a consistent approach. The allocation process will change from a centralised model to Probation Delivery Managers allocating cases. This will build new expectations around checking that relevant safeguarding checks have been completed and ensuring that Probation Delivery Managers are following up the request to action and including assessments within a given timeframe. It will further seek to maximise resources to support Offender Managers managing risk by working with multi-agency Safeguarding Hub (MASH) like services in each geographical cluster to second Reducing Reoffending Partnership (RRP) staff to expedite and improve the quality of information flow in respect of safeguarding and domestic abuse in all cases. Planning: SWM CRC ensure planning is sufficiently focused on Cluster Deputy May 2020 areas relating to risk of harm and public protection by setting Leads expectations around risk management plans and initial sentence plans, promoting good practice and using the training and embedding process as described above. SWM CRC will ensure partnership activity is included in these plans by strengthening local partnership links and revisiting expectations around sharing plans where there are safeguarding or public protection risks. SWM CRC 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 around risk in place. SWM CRC will prioritise domestic abuse and safeguarding interfaces to strengthen local connections and partnership work.

<b>Delivery:</b> SWM 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. SWM CRC will use the reflective practice framework to ensure officers are aware of how home visits can be used to keep people safe, promoting learning from each other and live examples. SWM CRC will review the quality of sentence planning sequencing and delivery to ensure that there is a focus on risk of harm as the priority area in all cases.	Cluster Deputy Leads	July 2020
Reviewing: SWM CRC will improve on reviewing practice by changing the focus of supervision with Offender Managers from a performance led meeting to a case and risk review discussion. This will ensure cases are being reviewed at more regular intervals jointly by Offender Managers and their Probation Delivery Manager. SWM CRC will set increased frequency moving to monthly supervision for Offender managers. SWM CRC will build professional curiosity by embedding facilitated peer discussion on areas such as 'what constitutes significant changes?' and undertake exercises with Offender Managers focusing discussions on Serious Further Offences (SFOs) and victims' summary reports to ensure learning does not remain theoretical but 'live' to actual offender management practice. This will drive uptake of any required actions through wider and more holistic manager oversight inputs ensuring the whole case is reviewed rather than single focus actions. Through the continued case audit programme, the monitoring of appropriateness, quality and relevance of reviews, including progress against the supervision plan will be conducted.	Inspection and Quality Lead	July 2020
SWM CRC will introduce a keeping people safe checklist to ensure minimum actions are taken in this area for all cases.	Cluster Deputy Leads	March 2020

SWM CRC will ensure information gathered in prisons and by Through the Gate (TTG) teams is shared and used by revisiting through the gate processes and connection with community teams.	Through the Gate Leads	March 2020
SWM CRC will ensure actions are completed and measure the impact by:		
<ul> <li>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 MARAC attendance, MASH and IOM when appropriate. Benchmarking against risk escalation cases and timely transfer process, any actions specifically relating to the management of risk of harm and reoffending and evidence of the completion of the keeping people safe checklist.</li> <li>Setting a trajectory for improvement</li> <li>Creating a monthly score card and case audit analysis report demonstrating progress against the initial benchmarking and trajectory expectations.</li> <li>Evidence of increased information sharing following MASH links</li> <li>Ongoing 'mini' inspections to independently evaluate improvement against activity undertaken including one specifically focused on custody and through the gate cases</li> <li>Increased good and sufficient ratings for case audits against initial benchmark</li> </ul>		

			<ul> <li>Evidence of cross team auditing to increase benchmarking assurance</li> <li>All staff to have received keeping people safe input</li> <li>Analysis of case audit findings to be reviewed monthly at RRP ops board and Contract management meetings</li> <li>Increased contact with resettlement teams and use of prison assessments evidenced in case audits</li> <li>Evidence of local protocol for information sharing and pathways with partners in each cluster</li> <li>Evidence of learning and professional discussions embedded into practice in supervision notes and through practitioner forum feedback</li> <li>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.</li> </ul>		
2	Equip all staff with the skills and knowledge necessary to carry out effective work to keep other people safe.  This recommendation has been repeated from the previous inspection.	Agreed	SWM CRC will develop its learning offer so all new staff receive intensive input to ensure people are kept safe through the management of a sentence. SWM CRC will do this by ensuring that all new starters, and those from the past 2 years are provided with more intensive OASys and risk assessment training, with a focus on risk management plans. This training will then 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.  SWM CRC will address gaps in staff knowledge and skills by delivering 'professional curiosity' and other prioritised skills training (Think Victim and active case management, Check-in, Review, Implement, Set Tasks and Summarise (CRISS), risk management planning, recall and breach training) through collaboration with the NPS. This will build on work to embed a	Cluster Deputy Leads  Cluster Deputy Leads	July 2020

more investigative approach in RRPs and offender management and embed this learning through the reflective framework. This skills training will align with transitions work in this area to ensure that CRC staff are properly prepared for increased public protection risk work		
SWM CRC will embed newly qualified learning by ensuring all recent PQiPs access the newly qualified officer training delivered by the NPS.  SWM CRC will support learning and the embedding of newly	Learning and Development Lead	Ongoing
qualified officer training into practice through the recruitment of Quality Development Officers and collaborating with the NPS in this initiative, supporting Probation Delivery Managers to achieve public protection outcomes through specialist support roles.	Learning and Development Lead	April 2020
SWM 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 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.	Inspection and Quality Lead and Cluster Leads	July 2020
SWM CRC will open development and learning opportunities for experienced PSOs to become Probation Officer qualified practitioners by working with the NPS to develop a pathfinder programme and 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 above.	Cluster Heads	March 2020
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SWM CRC will ensure all external training opportunities, for example through safeguarding Boards and Police Multi-agency Risk Assessment Conference (MARAC) are available, advertised and attended by SWM staff which will expand officers understanding of risk into wider partnership areas.	Cluster Deputy Leads	April 2020
SWM CRC 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.	Public Protection Lead	June 2020
SWM CRC will prioritise the right actions to keeping people safe by setting a clear plan of work for the CRC Public Protection Group to identify actions following feedback from case audit analysis, SFO learning and training gap analysis.	Public Protection Lead	April 2020
SWM CRC will retain 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.		
SWM CRC will ensure actions are completed and measure the impact by:		
<ul> <li>Building a requirement in supervision for officers to discuss and demonstrate how recent training has impacted on their practice.</li> <li>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 into a monthly scorecard to ensure visibility.</li> </ul>		
Evidence of practitioner forums in place across clusters / teams with attendance mandated.		

			<ul> <li>Recruitment of additional QDO roles to support delivery and development.</li> <li>Build into supervision a process for Continual Professional Development with evidence of at least one externally attended training input per officer per year.</li> <li>Successfully delivering a pathway programme for experienced PSOs to quality as Probation Officers (POs).</li> <li>Evidence of learning translating into practice demonstrated in monthly case audit analysis.</li> </ul>		
3	Address high levels of sickness absence and staff concerns about health and safety.  This recommendation has been repeated	Agreed	SWM CRC will continue to address high levels of sickness absence by continuing work on health and wellbeing by ensuring trends and emerging issues are tracked by a new IT system - HR access which will be embedded by June 2020. This will allow trends and emerging issues to be identified ensuring proactive and positive responses rather than reactive.	HR Leads and Health and Safety Leads	June 2020
	from the previous inspection.		SWM CRC will continue to support managers to manage absence positively by providing continued absence management training and HR support for complex cases.	HR Lead	Ongoing
			SWM CRC will address staff safety concerns by implementing contingency planning and testing to occur in each cluster to ensure health and safety concerns are embedded in local team meetings.	Health and Safety Lead	June 2020
			SWM 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 by reducing staff workload and seeking to address stress within staff groups.	Director of Operations	March 2020

SWM CRC will build resource and capacity in strategic posts by seconding management and senior leadership posts to support transitions and improvements therefore removing this requirement away from middle managers creating time for them to focus on public protection work.	Director of Operations	March 2020
SWM 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
SWM 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.  SWM CRC will ensure actions are completed and measure the impact by:	Inspection and Quality Lead/Cluster Deputy Heads	July 2020
<ul> <li>Benchmarking average sickness and setting trajectory for 11 days.</li> <li>Confirming all managers have been trained in appropriate sickness process.</li> <li>Undertaking a contingency exercise in each cluster.</li> <li>Ensuring secondments are in place.</li> <li>Ensuring roles are advertised across both organisations.</li> <li>Addressing team size inequalities for PDMs</li> <li>Addressing caseload inequalities where possible, using the average caseload tool to benchmark and track caseloads.</li> </ul>		

4	Develop and implement a clear and consistent approach to the middle manager role in improving public protection practice and the overall quality of case management.	Agreed	SWM CRC will help Probation delivery managers 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. SWM CRC will support Probation Delivery Managers with further development in coaching and mentoring skills. This will be achieved by reviewing the current expectations of 1-1 and group supervision and mirroring elements of the SEEDS 2 supervision and practice approach in line with the NPS delivery model, specifically embedding the CRISS model to improve all case recording.	Learning and Development Lead	April 2020
			SWM CRC will support Probation Delivery Managers 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 SWM CRC will tailor appropriate inputs and support to ensure Probation delivery managers understand and are applying these benchmarks across the CRC. There will be ongoing work with Probation delivery managers to support them in developing the correct skills to support their teams through training, the reflective practice framework and facilitated action learning sets.	Inspection and Quality Lead	July 2020
			SWM CRC will support Probation Delivery Managers who identify training or capability gaps in teams by providing additional resources to deliver industry standard workshops in keeping people safe. SWM CRC will deliver 'professional curiosity' and other prioritised skills training (Think Victim and active case management, Check-in, Review, Implement, Set Tasks and Summarise (CRISS), risk management planning,	Inspection and Quality Leads/ Deputy Cluster Leads	July 2020

			recall and breach training) through collaboration with the NPS to all staff who require this.  SWM CRC will ensure actions are completed and measure the impact by:  • 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 and 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 of agreed supervision processes being undertaken in their teams.  • Ensuring a timely response is made to requests for capability and training needs.		
5	Integrate improved administration capacity into the operational delivery teams.	Agreed	SWM CRC will ensure the collation of all available risk of harm and risk of reoffending information at the first opportunity by working towards aligning NPS and CRC allocation processes.  SWM CRC will improve safeguarding checks by moving from a	Customer Service Centre (CSC) Lead CSC Lead	April 2020 March 2020
			centralised system to checks occurring in local clusters. SWM CRC will instigate new procedures by identifying partnership Single Point of Contacts (SPOCs) and clear local ownership with locally based administration relocated from the central customer	COC Load	Water 2020

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		
SWM CRC will maximise administrative support including telephony to operational staff through the restructure of administration to ensure officers have the time to follow up available risk information at the start of the Order.	CSC Lead	March 2020
SWM CRC will review the operating model to ensure the appropriate cases are being allocated to the right grade of officer with the right experience by trialling PDM allocation rather than the centralised administrative allocation process currently in place.	Cluster Heads	March 2020
SWM CRC will review additional administrative support for Probation Delivery Managers to give them the time and space to focus on keeping people safe, including a new management coordination hub mirroring National Probation Service pilots. These will provide support with current administration processes sitting with Probation Delivery Managers.	Director of Operations	April 2020
SWM CRC will ensure actions are completed and measure the impact by:		
<ul> <li>Benchmarking current performance in: initial sentence plans and risk management plans focusing on safeguarding checks and the inclusion of risk of harm information; Safeguarding checks being undertaken and followed up when required; Partnership co-working and information sharing in plans and case management records; Appropriate</li> </ul>		

	<ul> <li>allocation of cases by PDMs; Actions specifically relating to the management of risk of harm and reoffending.</li> <li>Setting a trajectory for improvement.</li> <li>Creating a monthly score card and case audit analysis report demonstrating progress against the initial benchmarking and trajectory expectations.</li> <li>Implementing process change in allocations where appropriate, in line with NPS processes and ensuring this is in line with transitions planning.</li> <li>Confirmation that all centralised call handlers are in local offices to maximise administrative support.</li> <li>Identifying tasks which can be amended or removed from PDMs to free time up for PDMs.</li> </ul>	
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