



HM Prison &
Probation Service

Action Plan Submitted: 20th August 2020

A Response to the HMI Probation Inspection: National Probation Service North West Division

North West NPS Region

This is one of two HMIP Action Plans for the North West NPS. The HMIP Inspection of the North West NPS area was undertaken at a time when the North West were operating as a single Division, however the Division has since been split into two separate regions – North West Region and Greater Manchester Region. Two Action Plans have been produced in line with this new regional structure.

Report Published: 14 July 2020

Actions against target dates are likely to be delayed due to Covid-19 related disruptions to service delivery.

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 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: North West National Probation Service

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner (including named individuals and their functional role or department)	6. Target Date
1	North West NPS should ensure that all changes to risk of harm are properly recorded in risk management plans. This recommendation has been repeated from the previous inspection.	Agreed	<p>1.1 North West NPS will review the content of the current Regional Risk Assessment Practice (RAP) training events and Serious Further Offence (SFO) learning events in relation to the reviewing of risk management plans and sentence plans. North West NPS will ensure that training emphasises the importance in the review process of seeking information from all sources and the active engagement of service users. North West NPS will continue to deliver this programme of training for all Offender Management (OM) staff. These will be mandated for staff who have yet to attend, supported by a prioritisation system to manage the tension between demand and supply. Training outcomes will be monitored via assurance activity including management countersigning of Offender Assessments (OASys) and bi-annual audits of OASys.</p> <p>1.2 North West NPS will undertake a review of local and national OASys related practice guidance with a view to streamlining documentation, relating to Risk of Serious Harm (ROSH) Summary, Risk Management Plan (RMP) and Sentence Plan (SP) sections and sharing this in a way that better meets the needs of North West NPS staff.</p> <p>1.3 North West NPS will implement the recently revised OASys tool, which includes significant changes to the RMP format, through provision of national guidance, e-learning, practice support tools and staff briefings. Embedding of learning will be monitored via staff training records, management countersigning of assessments and bi-annual audits of OASys.</p> <p>1.4 North West NPS will review and refresh the regional OASys countersigning guidance to ensure focus on the particular areas identified by the HMIP findings, specifically the ROSH summary, RMP and SP sections. North West NPS will disseminate this to all countersigning managers through delivery of</p>	<p>Head of Performance and Quality</p> <p>Head of Performance and Quality</p> <p>Head of Performance and Quality</p> <p>Head of Performance and Quality</p>	<p>October 2020 for completion of content review</p> <p>December 2020</p> <p>October 2020 for completion of initial implementation</p> <p>March 2021</p>

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			<p>Management Team Briefings and monitor via analysis of quality of countersigned assessments from the bi-annual OASys audit.</p> <p>1.5 North West NPS will develop and implement a 'Touch-point Review' model which retains the national principles of professional judgement but also introduces minimum OASys review timescales of 6 months in all but exceptional circumstances. This will promote more regular review of risk management plans and will be monitored through OASys completion reporting and management oversight of Professional Judgement (PJ) recorded decision making. Due to achieved improvements in staffing levels North West NPS will now recruit Quality Development Officers (QDO) back up to nationally assigned regional resource allocation levels. This will provide enhanced capacity to deliver HMIP related quality improvement and assurance activity.</p> <p>1.6 North West NPS will engage staff in a wider consultation and review of the issues feeding into this recommendation to inform development of additional support and improvement initiatives in relation to the quality of RMP reviews. This work will be carried out via targeted focus groups, surveys and/or working groups.</p>	<p>Head of Performance and Quality</p> <p>Head of Performance and Quality</p>	<p>March 2021</p> <p>December 2020</p>
2	<p>North West NPS should undertake domestic abuse and child safeguarding checks in a timely manner for those cases where reports are being presented at court. This recommendation has been repeated from the previous inspection and should be addressed as a priority.</p>	Agreed	<p>2.1 Considering the noted local variations in the accessibility and provision of safeguarding information, North West NPS will work collaboratively with staff and key stakeholders to undertake a regional mapping and review exercise of local arrangements for obtaining safeguarding information at Court level. North West NPS will seek to identify gaps in provision and to develop and implement viable solutions.</p> <p>2.2 North West NPS will review current administrative support arrangements in Court Teams with a view to identifying support resources to assist Court Officers in the delivery, recording and follow-up of safeguarding checks.</p> <p>2.3 North West NPS will establish and communicate to all Court staff the expectations of consistent methods for recording Child Safeguarding and Domestic Abuse (DA) checks and responses.</p> <p>2.4 North West NPS will develop and embed targeted management information and reporting mechanisms to monitor improvements in the delivery and recording of domestic abuse and safeguarding checks. Reporting</p>	<p>Head of Public Protection</p> <p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement and</p>	<p>March 2021</p> <p>March 2021</p> <p>October 2020</p> <p>March 2021</p>

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			<p>information will be monitored by the North West Senior Leadership Team and will be shared with Court SPOs to inform their reflective supervision meetings with individual staff members.</p> <p>2.5 North West NPS will develop and implement a Court Quality Assurance Programme that includes an additional 'Light touch' audit which focuses on DA and child safeguarding practice. This will be applied to 10% of all reports per team at the end of each month until the Senior Probation Officer (SPO) is satisfied that DA/Safeguarding checks are embedded into the individual officers practice.</p> <p>2.6 North West NPS will engage court staff in a wider consultation and review of the issues feeding into this recommendation to inform development of additional support and improvement initiatives. This work will be carried out via targeted focus groups, surveys and/or working parties</p> <p>2.7 North West NPS will ensure that all eligible court staff have completed the mandatory DA and Child Safeguarding Training. Embedding of learning will be monitored via staff training records and findings from reporting information and the light-touch audit.</p> <p>2.8 North West NPS will contribute to the National Court Strategy Group who are working to develop improved processes for information exchange with Police and Children's Social Care to develop and implement a national agreed position for information exchange between NPS, Police and Children's Social Care.</p>	<p>Head of Performance and Quality</p> <p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement</p> <p>Head of Operations</p> <p>Head of Stakeholder Engagement</p>	<p>March 2021</p> <p>December 2020</p> <p>March 2021</p> <p>March 2021</p>
3	<p>North West NPS should put in place appropriate contingency plans (as part of risk management plans) to address identified risks, particularly in relation to domestic abuse and safeguarding. This recommendation has been repeated from the previous inspection and should be addressed as a priority.</p>	Agreed	<p>Actions 1.1, 1.2, 1.3, 1.4 and 1.6 from recommendation 1 will address this recommendation. North West NPS will also take the following additional actions:</p> <p>3.1 North West NPS will provide focused guidance to staff on the expected content of OASys question R10.4 "<i>What circumstances are likely to increase risk</i>" in the ROSH summary and how this should inform the Contingency Plan.</p> <p>3.2 North West NPS will develop and implement workshops and supporting materials for assessors which is specific to contingency planning and in particular to plans for managing DA and safeguarding concerns. Improvements will be monitored via management countersigning of OASys and .and bi-annual audit of a sample of contingency plans.</p>	<p>Head of Performance and Quality</p> <p>Head of Performance and Quality</p>	<p>October 2020</p> <p>March 2021</p>

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4	North West NPS should undertake risk of harm assessments in all applicable cases.	Agreed	<p>4.1 North West NPS will re-issue guidance to staff to ensure a consistent understanding and approach to the delivery of risk of harm assessments at Court. Completion of assessments will be monitored via the light-touch audit. This will be applied to 10% of all reports per officer per month. The additional light touch audits will continue until the SPO is satisfied that timely completion of risk of harm assessments has been embedded into practice</p> <p>4.2 North West NPS will monitor quality of Court completed risk of harm assessments through the delivery of assurance activity including management countersigning of OASys and a bi-annual audit of a sample of completed OASys assessments with a particular focus on ensuring assessments are based on the gathering of all appropriate sources of information.</p> <p>4.3 North West NPS will complete a training needs analysis for all Court staff. SPOs will then be required to implement a subsequent development plan for individual staff and will be expected to have recorded in staff supervision notes that relevant training has been completed and assessment quality standards are understood.</p> <p>4.4 North West NPS will review and refresh the regional OASys countersigning guidance to ensure that a focus is brought on to quality of OASys risk analysis, including the need for full risk of harm analysis to be completed in all relevant cases. North West NPS will disseminate this to all countersigning managers through delivery of Court Management Team Briefings and monitor via analysis of quality of countersigned assessments from the bi-annual OASys audits.</p> <p>4.5 In recognition that effective improvement needs to be driven from the 'bottom up', North West NPS will introduce risk assessment/quality 'champions' in each Court team, who will deliver risk workshops to colleagues to promote completion of good quality risk analysis in all relevant cases.</p> <p>4.6 North West NPS will consult with Court staff to identify where and why deviations from national policy on assessment practice are occurring to enable a tailored and targeted approach to improvement. Alongside this, we will engage Court staff and key stakeholders in a wider consultation to inform a review of the Court Quality Improvement Programme approach.</p>	<p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement and Regional Training Manager</p> <p>Head of Performance and Quality and Stakeholder Engagement Group Lead</p> <p>Stakeholder Engagement Group Lead</p> <p>Stakeholder Engagement Group Lead</p>	<p>December 2020</p> <p>March 2021</p> <p>March 2021</p> <p>March 2021</p> <p>March 2021</p> <p>March 2021</p>

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5	North West NPS should complete safeguarding checks in light of new information and follow up responses promptly.	Agreed	<p>5.1 North West NPS will provide immediate local guidance to staff on the expected content of RMPs in relation to specifying frequency/timescales of safeguarding checks. Application of this will be monitored via assurance activity including management countersigning of assessments and audits of OASys.</p> <p>5.2 North West NPS will update the current local Management Oversight (MO) template to prompt discussion about safeguarding checks within MO meetings.</p> <p>5.3 North West NPS will ensure that all eligible staff have completed the mandatory DA and Child Safeguarding Training. Embedding of learning will be monitored via staff training records and quality assurance activity, the latter of which will include an audit of OASys contingency plans and an internal inspection, using HMIP guidance and standards, of a sample of domestic abuse and safeguarding cases.</p> <p>5.4 North West NPS will work collaboratively with staff and key stakeholders to undertake a regional mapping and review exercise of local Offender Management Unit (OMU) arrangements for obtaining safeguarding information at Cluster level. North West NPS will seek to identify gaps in provision or agreements and work collaboratively with key stakeholders to develop and implement viable solutions.</p> <p>5.5 North West NPS will evaluate and review the current Probation Operations Delivery model (POD) with a view to identifying support resources to assist Offender Managers in the routine scheduling, delivery and recording of safeguarding checks.</p> <p>5.6 To support and monitor improvements in the recording and follow up of DA and safeguarding checks we will develop and embed targeted management information and reporting mechanisms. This will be supported by the initial establishment of consistent methods for recording Child Safeguarding and DA checks and responses, together with communication of these expectations to all OMU staff.</p>	<p>Head of Performance and Quality</p> <p>Head of Public Protection</p> <p>Head of Operations</p> <p>Head of Public Protection</p> <p>Head of Operations</p> <p>Head of Performance and Quality and Head of Stakeholder Engagement</p>	<p>October 2020</p> <p>December 2020</p> <p>March 2021</p> <p>June 2021</p> <p>March 2021</p> <p>March 2021</p>
6	North West NPS should complete necessary adjustments to the ongoing plan of work to take	Agreed	As agreed with the Lead Inspector, all actions to address recommendation 1 are also relevant to recommendation 6. Please therefore see recommendation 1 for		

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	account of the changes in the risk of harm.		<p>actions 1.1 – 1.7 inclusive. In addition, North West NPS will also take the following actions:</p> <p>6.1 North West NPS will design and deliver training to assist OM staff with writing SMART Sentence Plan objectives, linked to motivational stages and incorporating sequencing of work to take into account any changes in the risk of harm. We recognise that improvements in the quality of sentence plan objectives will assist with their subsequent review. Improvements will be monitored via the countersigning processes and regional quality assurance activity.</p> <p>6.2 North West NPS will reinforce local Workload Management Tool (WMT) monitoring arrangements and ensure that where OMs workloads have been above 110% on the WMT for 4 weeks or more that line managers produce and implement a remedial action plan which is shared with the relevant Head of Cluster, who in turn will ensure that any Regional issues are escalated to the Regional Workforce Planning Committee for resolution. This is to ensure that Probation Officers workloads are reasonable and do not impact on the quality and frequency of OASys reviews.</p> <p>6.3 North West NPS will implement a management hub to support middle managers in the discharge of their functional responsibilities and to maximise their time for staff development and quality assurance activities related to OASys reviews. North West NPS will seek further opportunities to address the excessive workloads and spans of control of Offender Management SPOs including a review of the management oversight model.</p>	<p>Head of Performance and Quality</p> <p>Head of Operations</p> <p>Head of Operations</p>	<p>March 2021</p> <p>December 2021</p> <p>December 2021</p>
7	The Ministry of Justice should ensure that probation facilities are well maintained and provide a safe and enabling environment for work with offenders. This recommendation has been repeated from the previous inspection. We expect this recommendation to be addressed as a priority.	Agreed	<p>7.1 The estates strategy within the probation programme covers 4 years of future investment with the aim of providing a platform for the unification process and a modern working environment for staff and visitors. As a result, significant investment (c.£20m) is planned for properties in the North West region, including reconfiguration, major refurbishment and new for old. The latter includes a significant financial investment in Warrington and Burnley this financial year.</p> <p>7.2 The Ministry of Justice will also continue to invest in critical maintenance. In North West region this included £0.6m invested in key projects such as boiler replacements and £0.75m invested in vital repair work. 2020/2021 plans include investment in fire safety, lifts and shower facilities in Approved Premises.</p>	Chief Operating Officer & Director MoJ Account Management	<p>March 2021</p> <p>Ongoing 2020/2021</p>

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			7.3 In 2019 the Ministry of Justice introduced the Handyman service to approved premises. This has improved the response to small maintenance jobs. This service has been a success nationally and there are plans to extend it to contact centres by 31st October 2020.		October 2020
8	Her Majesty' Prison and Probation Service should review the decision not to issue responsible officers with personal alarms which in the assessment of HMIP unnecessarily increases the risks associated with home visits.	Not agreed	This recommendation is not agreed as within the NPS there is a comprehensive risk based Home Visits Probation Instruction that puts many risk based control measures in place prior to and during any community Home Visit being carried out, including assessing the risk to staff from the service user, and requiring staff to maintain contact via mobile phones during and after the visits.	Deputy Director for Business Strategy and Change	
9	Her Majesty' Prison and Probation Service should ensure that learning and development resources are available to deliver mandatory training in child and adult safeguarding to NPS staff. This should be urgently addressed.	Agreed	<p>As a minimum, all staff are required to complete a level 3 Child Safeguarding eLearning package as a minimum on a 3 year basis. NPS learning data shows that a proportion of staff (21%) in the North West have yet to complete the eLearning or their training has expired. All staff have this requirement in their 'required learning tab' on MyLearning which will be marked red if not completed within the required period. The Divisional Training Manager will also pull mandatory training completions reports from MyLearning monthly. This report is circulated to the NPS SLT so that Heads of Cluster can identify all those staff who have / have not complied with the requirement to complete this mandatory training and can progress this through SPO's and Business Managers. There are also Learning and Development (L&D) schedules so that all staff understand the mandatory L&D requirements for their role.</p> <p>Additional resource is being acquired to enable the NPS National Training Team to fulfil the requirement to deliver a one day Safeguarding Training Event. HMPPS are committed to recruit trainers to deliver a digital version of this face-to-face package as a priority and aim to have the required resource in place by September 2020 to cover the remaining demands in relation to child safeguarding training. These numbers have been based the number of FTE staff who have yet to complete the face to face training.</p> <p>The Probation Workforce Programme is developing a new learning and development delivery model for probation. This will create capacity by transforming learning design and delivery methods, making better use of face-</p>	<p>Head of Learning and Development, HMPPS</p> <p>Head of Learning and Development, HMPPS</p> <p>Deputy Director for the Probation Workforce Programme</p>	<p>September 2020</p> <p>September 2020</p> <p>March 2021</p>

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			to-face trainer resources. It will set the foundations for a modernised, agile learning model.		
10	Her Majesty' Prison and Probation Service should review the NPS resourcing model to see if, (following the implementation of Offender Management in Custody), it sufficiently meets the demands of the NPS caseload.	Agreed	<p>HMPPS are recruiting and training increased numbers of probation officers to support the service and caseloads. In 2020/21 HMPPS plan to recruit at least 1000 trainee probation officers across the NPS and CRCs. By June 2021 the number of trainee probation officers recruited each year will have significantly increased to be as close as possible to target staffing of the target operating model.</p> <p>Resourcing of OMiC will include all aspects of the model and OMiC have a system in place for yearly reviews within the projects lifetime; as OMiC requires probation staff in prison offender management units this is taken account viewing the national picture for NPS and HMP resourcing.</p> <p>OMiC continues to work with People Group Resourcing team to ensure that OMiC target staffing figures are met. Probation staff recruitment is a priority for People Group and Senior HRBPs will continue to report on staffing numbers to ensure the correct targets are met with the recruitment team.</p>	<p>Deputy Director for the Probation Workforce Programme</p> <p>People Group NPS Resourcing Team</p> <p>People Group NPS Resourcing Team</p>	<p>June 2021</p> <p>Yearly reviews</p> <p>Next Assessment centre is September 2020</p>