



HM Prison &
Probation Service

Action Plan Submitted: 20 August 2020

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

Greater Manchester 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.



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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>The National Probation Service (NPS) Greater Manchester (GM) region will work to ensure that changes to risk of harm are properly recorded in risk management plans by:</p> <p>1.1 Implementing and embedding the nationally revised version of the Offender Assessment System (OASys). This introduces significant changes to the Risk Management Plan (RMP) designed to improve not only functionality but the quality of assessment, risk management and contingency planning. This will be implemented in accordance with the national implementation plan, which includes provision of quality guidance and e-learning materials to all staff. The National Probation Service GM region will supplement this by providing additional staff briefings. Delivery and embedding of learning will be monitored via staff training records and assurance activity, including management countersigning of Offender Assessments (OASys) and a bi-annual audit of a sample of completed OASys assessments.</p> <p>1.2 Developing and implementing management information reports to monitor, analyse and drive improvements in frequency of reviews. Learning from this and bi-annual OASys audits will be discussed and explored at GM quarterly Senior Leadership Meetings and shared with operational Senior Probation Officers (SPO) to inform local Practice Development Forum content and their reflective supervision meetings with individual staff members.</p> <p>1.3 Reviewing the content of the current Regional Risk Assessment Practice (RAP) training and Serious Further Offence (SFO) learning events to align them with national changes to OASys and to incorporate learning from the HMIP inspection. The National Probation Service Greater Manchester (GM) region will continue to deliver this programme of training and workshops to Offender Managers and SPOs, mandating attendance for new staff and those identified by self or manager referral as requiring refresher training. Training attendance will be monitored via staff training records and embedding of learning</p>	<p>ACO – OASys Lead and Head of Performance and Quality</p> <p>Head of Performance and Quality</p> <p>Head of Performance and Quality</p>	<p>August 2020 for completion of initial implementation</p> <p>March 2021 for completion of first audit</p> <p>October 2020 for completion of content review</p>

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			<p>will be monitored via assurance activity, including management countersigning of Offender Assessments (OASys) and a bi-annual audit of a sample of completed OASys assessments.</p> <p>1.4 Undertaking a review of local and national OASys related practice guidance and the approach to the communicating and sharing of this with staff with the intended outcome resulting in the streamlining of documentation and locating and sharing of this is a way that better meets the needs of NPS GM region staff.</p> <p>1.5 Contributing to work led by the national Effective Practice and Service Improvement Group to review the current approach to SPO OASys countersigning and reviewing regional OASys countersigning guidance to ensure that sufficient attention is paid to the quality of Risk Management Plans, Contingency Plans and Sentence Plans. NPS GM will disseminate this to all countersigning managers through delivery of Management Team Briefing events and monitor embedding of learning via analysis of quality of countersigned assessments from the bi-annual OASys audit.</p>	<p>Head of Performance and Quality</p> <p>Head of Performance and Quality</p>	<p>December 2020</p> <p>March 2021</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>The NPS GM will improve domestic abuse (DA) and child safeguarding checks at Court by:</p> <p>2.1 Working collaboratively with staff and key stakeholders to undertake a regional mapping and review exercise of local arrangements for obtaining information at Court level. NPS GM will seek to identify gaps in provision or agreements and implement viable solutions to improve information sharing.</p> <p>2.2 Reissuing guidance to Court staff to ensure a consistent understanding and approach to recording and tracking of safeguarding and DA checks and responses.</p> <p>2.3 Monitoring improvements in the recording and follow up of domestic abuse and safeguarding referrals by developing and embedding targeted management information and reporting mechanisms. Reporting information will be discussed and explored at quarterly GM Senior Leadership Meetings and shared with Court SPOs to inform content of practice discussion workshops and their reflective supervision meetings with individual staff members.</p>	<p>Head of Stakeholder Engagement and Head of Public Protection</p> <p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement and Head of Performance and Quality</p>	<p>March 2021</p> <p>October 2020</p> <p>March 2021</p>

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			<p>2.4 Developing and implementing a Court Quality Assurance Programme that includes an additional 'Light touch' audit which focuses on DA and safeguarding practice. This will be applied to 10% of all reports per officer per month where DA/safeguarding has been identified. The additional light touch audits will continue until the SPO is satisfied that DA/safeguarding checks have been embedded into practice.</p> <p>2.5 Ensuring that all eligible court staff have completed the mandatory Domestic Abuse 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>2.6 Contributing 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>2.7 Developing and implementing a GM pathfinder to improve inter-agency engagement with the provision of DA and safeguarding information to provide enhanced focus on more effective risk assessment (courts), sentence planning and public protection (offender management). The pathfinder will explore the feasibility of establishing a centralised NPS GM resource to streamline access to DA and safeguarding information with learning to be shared via the National DA Group.</p>	<p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement</p> <p>Regional Director (national DA lead)</p>	<p>March 2021</p> <p>March 2021</p> <p>November 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>In addition to delivery of action 1.1, 1.4 and 1.5 which are also directly relevant to this recommendation, NPS GM will work to improve RMP contingency plans, particularly in relation to domestic abuse and safeguarding, by:</p> <p>3.1 Developing and delivering workshops to assist offender managers with designing appropriate contingency plans, with a specific focus on domestic abuse and safeguarding. Improvements will be monitored via management countersigning of OASys and .and bi-annual audit of a sample of contingency plans.</p> <p>3.2 Ensuring there are appropriate links with the relevant Greater Manchester Combined Authority (GMCA) Forums such as DA and Violence Reduction Unit (VRU) to share learning and access relevant Learning and Development events within the GM Devolved Region.</p>	<p>Head of Performance and Quality</p> <p>Head of Operations</p>	<p>March 2021</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>The NPS GM will work to ensure risk of harm assessments are completed in all applicable cases by:</p> <p>4.1 Re-issuing 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 Monitoring 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 focus on ensuring assessments are based on the gathering of all appropriate sources of information.</p> <p>4.3 Completing 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 Establishing Thematic Champions in each court team who will drive and support the quality improvement agenda, including completion and quality of risk of harm assessments. Alongside the SPO, Thematic Champions will be given time to facilitate practice discussions and workshops to improve knowledge, skills and confidence.</p>	<p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement</p> <p>Head of Stakeholder Engagement and Head of Learning and Development</p> <p>Head of Stakeholder Engagement</p>	<p>December 2020</p> <p>March 2021</p> <p>March 2021</p> <p>March 2021</p>
5	North West NPS should complete safeguarding checks in light of new information and follow up responses promptly.	Agreed	<p>The NPS GM will improve planning and delivery of work in response to changes in risk of harm by:</p> <p>5.1 Working collaboratively with staff and key stakeholders to undertake a regional mapping and review exercise of local arrangements for obtaining safeguarding information at Cluster level. NPS GM will seek to identify gaps in provision or agreements and work collaboratively with key stakeholders to develop and implement viable solutions.</p> <p>5.2 Incorporating SPO oversight of safeguarding checks into the Management Oversight Model and into SPO Countersigning</p>	<p>Head of Public Protection</p> <p>Head of Public Protection</p>	<p>March 2021</p> <p>December 2020</p>

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			<p>requirements to increase management oversight and provide additional assurance that checks are being made considering new information and follow up activity is taking place.</p> <p>5.3 Ensuring that all eligible staff have completed the mandatory Domestic Abuse and Child Safeguarding Training. Embedding of learning will be monitored via staff training records and quality assurance activity to include an audit of the management of a sample of domestic abuse and safeguarding cases.</p> <p>5.4 Ensuring consistency in understanding and application of recording expectations of Child Safeguarding and Domestic Abuse checks and responses. To support and monitor improvements in the recording and follow up of domestic abuse and safeguarding referrals, NPS GM will develop and embed targeted management information and reporting mechanisms.</p>	<p>Head of Public Protection</p> <p>Head of Public Protection and Head of Performance and Quality</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 account of the changes in the risk of harm.	Agreed	<p>In addition to delivery of actions 1.4 and 1.5 above which are directly relevant to this recommendation, the NPS GM will improve planning and delivery of work in response to changes in risk of harm by:</p> <p>6.1 Developing and delivering workshops to assist offender managers with writing and implementing SMART Sentence Plans to be more responsive to changes in risk of harm. Improvements will be monitored via management countersigning of OASys and a bi-annual audit of a sample of sentence plans.</p> <p>6.2 Working proactively to improve SPO workloads and capacity including rationalising GM functional leads work; implementing Functional Support Hubs and securing additional SPO resources in order to increase SPO capacity to implement cluster based Practice Development Forums and enable increased focus on staff development and quality improvement activity particularly in relation to OASys Reviews and sentence plan delivery.</p> <p>6.3 Reinstating the Quality Development Officer (QDO) resources to national resource allocation levels to provide enhanced capacity to undertake quality</p>	<p>Head of Performance and Quality</p> <p>Head of Operations and Heads of Cluster/Function</p> <p>Head of Performance and Quality</p>	<p>February 2021</p> <p>December 2021</p> <p>November 2020 for QDO recruitment</p>

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			improvement and assurance activity across the region in relation to OASys reviews and sentence plan delivery practice.		
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, including reconfiguration, major refurbishment and new for old. The latter includes a multi-million-pound investment in refurbished grade A space in the centre of Manchester, which is currently underway. This will build on recent investment in the region which includes the fit out of a new property in Ashton-under-Lyne which staff moved into in December 2019.</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> <p>7.3 In 2019 the Ministry of Justice introduced the Handyman service to approved premises. This has improved the response to small maintenance jobs. Since the service started NW have raise c. 80 jobs of which c. 70 are complete. This service has been a success nationally and there are plans to extend it to contact centres by 31st October 2020.</p>	Chief Operating Officer & Director MoJ Account Management	March 2021
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 a number of 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	Agreed	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	Head of Learning and Development, HMPPS	September 2020

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	development resources are available to deliver mandatory training in child and adult safeguarding to NPS staff. This should be urgently addressed.		<p>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 on the number of 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-to-face trainer resources. It will set the foundations for a modernised, agile learning model.</p>	<p>Head of Learning and Development, HMPPS</p> <p>Deputy Director for the Probation Workforce Programme</p>	<p>September 2020</p> <p>March 2021</p>
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>

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