



HM Prison &
Probation Service

Domestic Abuse HMIP Action Plan

Action Plan Submitted: 7th November 2018

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

Report Published: 25th September 2018

Midway Update Submitted: 28th June 2019

Final Update Submitted: 5th November 2019

INTRODUCTION

Her Majesty's Inspectorate of Probation is the independent inspector of youth offending and probation services in England and Wales. It reports on the effectiveness of probation and youth offending service work with adults and children.

In response to the report, HMPPS/MoJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are published on the HMI Probation website. Progress against the implementation and delivery of the action plans will be monitored by HMPPS/MoJ and reviewed by HMI Probation via annual inspection.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



			<p>HMPPS are updating and refocussing the national Effective Proposal Framework indicators, which are monitored to improve advice to sentencers by the National Probation Service (NPS) and targeting of accredited programmes. In addition, a range of contractual levers and performance levels to secure these outcomes are under review.</p> <p>The Domestic Abuse Bill was published on 21st January 2019 and is available on the Government website. This is the most comprehensive package ever released in relation to tackling Domestic Abuse in the UK and MoJ have committed to taking all reasonable measures within their power to protect victims and robustly intervene with perpetrators.</p> <p>Update November 2019</p> <p>Agreed actions in relation to the Probation Review remain ongoing; all offenders, including Domestic Abuse (DA) perpetrators, will be managed by the National Probation Service (NPS), commencing in Wales in December 2019. Roll-out in England has now been set to Summer 2021 to ensure a safe and effective transition.</p> <p>New contracts will require the contracted providers to offer a non-accredited intervention for domestic abuse perpetrators who are not eligible/ able to attend the Building Better Relationships (BBR) programme. The competition to procure Probation Delivery Partners, for delivery of both BBR and the non-accredited structured Domestic Abuse interventions, will be launched by the end of 2019.</p> <p>The update of the national Effective Proposal Framework indicators has been completed as planned.</p>	<p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p>	<p>August 2019</p> <p>December 2020</p> <p>Summer 2021</p> <p>December 2019</p> <p>Completed</p>
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2	<p>Her Majesty's Prison and Probation Service should:</p> <p>Identify and disseminate an effective, integrated pathway for working with domestic abuse that takes account of the full range of domestic abuse contexts and the need to protect victims and children.</p>	Agreed	<p>Action Plan November 2018</p> <p>HMPPS will issue a new Domestic Abuse Policy Framework which will highlight expectations for working with domestic abuse perpetrators and set out access to interventions and referral routes including those aimed at protecting victims and children.</p>	Head of Public Protection Group	June 2019
			<p>Update June 2019</p> <p>Work on the Domestic Abuse Policy Framework is underway and a draft is due to be sent out for consultation by the end of June 2019. A single page visual representation of the pathway for working with offenders, referrals to interventions, and safeguarding victims and children will be provided by July 2019. Staff changes have delayed the publication of the framework but HMPPS are committed to progressing this and delivering a product that will strengthen work with domestic abuse perpetrators and improve safeguarding of victims and children.</p>	Head of Public Protection Group	November 2019
			<p>Update November 2019</p> <p>The Domestic Abuse Policy Framework is in final draft following consultation. Feedback from stakeholders, including HMI Probation, has been incorporated and the policy is due to go through operational policy clearance process in November with a view to publishing in January 2020.</p>	Head of Public Protection Group	January 2020



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



			<p>Update November 2019</p> <p>The feasibility study to assess the most appropriate methodological approach for an evaluation of BBR remains on track for delivery by the end of 2019/20.</p> <p>Roll out following the Effective Intervention Panel (EIP) pilot remains on track for December 2020. Tyne and Wear has been confirmed as an early adopter site, where the EIP intend to assure their first programme by the end of December 2019. This approach will also be used to assure programmes targeting Domestic Abuse.</p>	<p>Deputy Director, (Prison and Probation Analytical Services)</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p>	<p>March 2020</p> <p>December 2020</p>
4	<p>Community Rehabilitation Companies should make sure that: Responsible officers have the right training and support to identify and manage the risk of harm posed by perpetrators of domestic abuse.</p>	Agreed	<p>Action Plan November 2018</p> <p>CRCs accept the importance of domestic abuse (DA) training and where gaps exist, plans are in place to increase/improve arrangements. Contract management teams (CMTs) will carry out assurance checks to ensure improved training arrangements are put in place. CRCs are continuing to develop their Quality Assurance Frameworks and CMTs are monitoring delivery of QA activity on a quarterly basis. CRCs will be expected to evidence their approach to managing the risk of harm posed by DA perpetrators and the systems in place to support Responsible Officers (RO) in this work.</p> <p>Update June 2019</p> <p>All CRCs have provided additional DA training for staff including Spousal Assault Risk Assessment, Safeguarding and general risk management training. DA is included in induction training for new staff across all CRCs. The majority have also completed best practice workshops. New guides and revised DA policies/strategies have been launched where deemed appropriate by the CRC Chief Executive Officer. Local Contract Management Teams (CMT) continue to monitor the level of training completed.</p> <p>All CRCs now have Quality Assurance (QA) processes in place and audits to cover key themes including DA. There is also a significant rise in enhanced management oversight and the use of DA competency checklists for staff and managers. Local CMTs have also designed local compliance exercises to check improvements.</p>	<p>CRC Chief Executive Officers / CRC Contract Management Team</p> <p>CRC Chief Executive Officers / CRC Contract Management Team</p> <p>CRC Chief Executive Officers / CRC Contract Management Team</p>	<p>April 2019</p> <p>Completed</p> <p>Completed and ongoing</p>



			<p>Update November 2019</p> <p>The majority of Community Rehabilitation Companies (CRCs) had a recommendation around risk of harm in their annual inspection which has increased the focus and attention given to this area of work. All CRCs have developed and delivered training packages on risk management and, in particular, the risk management of DA perpetrators. Improved Quality Assurance arrangements have also led to practice improvements but high staff turnover and recruitment issues in some CRCs have resulted in improvements being slower than anticipated.</p> <p>Planned arrangements, under which all offenders, including DA perpetrators, will be managed by the National Probation Service, remain on track to commence in Wales in December 2019 and England in Summer 2021. As a result, all Responsible Officers will be subject to NPS training arrangements and will receive formal NPS Supervisory and Line Management Meetings.</p>	<p>CRC Chief Executive Officers / CRC Contract Management Team</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p>	<p>Completed</p> <p>Summer 2021</p>
5	Domestic abuse cases are flagged appropriately on their information management systems to provide an accurate national picture of domestic abuse cases managed by CRCs.	Agreed	<p>Action Plan November 2018</p> <p>The CMT function continues to develop assurance exercises. CMT risk management monitoring includes checks to ensure consistent use of DV (Domestic Violence) flags to highlight DA cases. Where risk management is found to be insufficient, contractual remedies will be used.</p> <p>Update June 2019</p> <p>CMT assurance checks have shown that the use of DA flags continues to be inconsistent. This is in line with overall concerns in relation to case recording practice across almost all CRCs. Although there are some examples of improvement activity in internal QA processes, including the use of prompts and the checking of flags, this remains an area of concern. CMTs are monitoring risk management practice through the use of Continuous Improvement Plans and Action Plans (including checks to ensure consistent use of DV (Domestic Violence) flags to highlight DA cases). This will remain a priority area for CMTs over the next year.</p> <p>Update November 2019</p> <p>The correct use of DA flags has shown some improvements but this is not across the board and there is still some way to go before confidence levels in this data are at an acceptable level. The CMT continue to monitor the use of flags via compliance exercises. A new analyst has been appointed centrally, who will identify priority areas of performance for monthly monitoring of Management Information.</p>	<p>CRC Chief Executive Officers / CRC Contract Management Team</p> <p>CRC Chief Executive Officers / CRC Contract Management Team</p>	<p>December 2018</p> <p>Completed and monthly</p> <p>Completed and ongoing</p>



6	Service users complete appropriate, evidence-based interventions in a timely way, and that these interventions are delivered effectively and safely.	Agreed	<p>Action Plan November 2018</p> <p>All CRCs deliver the Building Better Relationships (BBR) accredited programme to DA perpetrators with a requirement attached to their community order or licence. The CMT function is currently developing a new Management Information report to monitor waiting times to drive improvements. We are also monitoring the use of Delius flags to check that CRCs are targeting their interventions appropriately. The Accredited Programmes Interventions Integrity Framework ensures the delivery of BBR is both safe and effective. The delivery of Rehabilitation Activity Requirements (RAR) is currently being reviewed by HMPPS. The Agency is working to deliver a range of improvements including the publication of operational guidance. In addition, some CRCs are looking for accreditation of their RAR DA interventions from external bodies, for example Wales CRC are working with Wales Effective Engagement Panel and Durham Tees Valley CRC are seeking independent accreditation.</p>	CRC Chief Executive Officers / HMPPS Whole System Improvement Team / CRC Contract Management Team	December 2018
			<p>Update June 2019</p> <p>HMPPS are updating and refocussing the national Effective Proposal Framework indicators, including to monitor the percentage of those potentially eligible for BBR that have it proposed to court.</p> <p>BBR continues to be delivered across all CRCs and the CMT developed Management Information (MI) is helping to hold CRCs to account for their waiting lists at monthly contract meetings. Nationally, offenders commencing BBR within the first six months of their order has increased from 68% to 75% since the MI was introduced. The Accredited Programmes Interventions Integrity Framework (IIF) tests programme delivery against accreditation standards. The IIF will continue to be used in relation to all accredited programmes following the probation systems review, including to test delivery of BBR by Innovation Partners¹.</p> <p>A Rehabilitation Activity Requirement (RAR) improvement action plan has been developed, and as part of this plan, Authority expectations about the development and delivery of RAR activities will be set out. Refreshed RAR guidance and updates to the RAR PI will be used to describe these</p>	Deputy Director (Probation Review and Vulnerable Offenders team)	August 2019
				CRC Chief Executive Officers / CRC Contract Management Team	Completed and quarterly
				Deputy Director, Whole System Development Group	September 2019



			<p>expectations. These are currently in draft and in consultation with MoJ Legal and Commercial before progressing through HMPPS governance.</p> <p>The following planned activities to improve the recording of RAR activity days are also on target for implementation in September 2019;</p> <ul style="list-style-type: none"> • Changes will be made to N-Delius to support accurate recording. • Prison & Probation Analytical Services have developed a Management Information report to track the recording of RAR activity days. It is hoped that this can be made available for all CRC's and NPS to access. <p>The Probation Programme has published its response to the 'Strengthening Probation' consultation which can be found on the Government website. This includes overall design intention for the RAR, including the core suite of interventions to be available from the market. Market engagement is underway as are planned stakeholder engagement events with operational NPS and CRC staff. The updated RAR guidance and PI will both support future design intent. Learning from EIP pilot sites will inform system design for the oversight of non-accredited interventions through future Probation contracts.</p> <p>¹ The term <i>Innovation Partners</i>, has been subsequently replaced by <i>Probation Delivery Partners</i> under the Probation Review.</p> <p>Update November 2019</p> <p>HMPPS have updated the national Effective Proposal Framework indicators and are monitoring the percentage of those potentially eligible for BBR that have it proposed to court.</p> <p>The Whole System Development group have completed the actions from the RAR Action Plan set out in June 2019, with the exception of revisions to the RAR Probation Instruction (PI), which will no longer be pursued in the short term.</p>	<p>Deputy Director, Whole System Development Group</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>Deputy Director, Whole System Development Group</p>	<p>September 2019</p> <p>Completed and ongoing</p> <p>Completed</p> <p>Completed</p>
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		<p>Update June 2019</p> <p>As part of future arrangements, all offenders, including DA perpetrators, will be managed by the National Probation Service. This will facilitate continuity of supervision and streamline processes for risk assessment, commencing in Wales in December 2019 and England in April 2021.</p> <p>All CMTs have now completed compliance work in relation to CRC risk management practice. This continues to show that safeguarding and DA checks are inconsistent. CRC leadership teams are continuing to put improvements in place but these are not always translating into discernible improvements in DA operational delivery. During the exit phase from the current CRC contracts, delivering safe services that protect the public has been identified as a priority area for CMT activity. HMPPS has put in place a governance structure to manage risks and contingencies during this period including an Operational Delivery Sub-board (monthly) and Stabilisation & Strategy Sub-board (monthly) that will specifically monitor risks to contract delivery.</p> <p>Update November 2019</p> <p>Planned arrangements, under which all offenders, including DA perpetrators, will be managed by the National Probation Service, remain on track to commence in Wales in December 2019 and England in Summer 2021.</p> <p>Risks in relation to risk management practice continue to be monitored by the Governance structure outlined above. The recently implemented Enhanced Through The Gate specification includes extra support for victims of domestic abuse and both the CMT and Operational and System Assurance Group (OSAG) have assurance plans in place to check that delivery meets the required standard.</p>	<p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>CRC Chief Executive Officers / CRC Contract Management Team</p> <p>Deputy Director (Probation Review and Vulnerable Offenders team)</p> <p>CRC Chief Executive Officers / CRC Contract Management Team</p>	<p>April 2021</p> <p>Completed and monthly.</p> <p>Summer 2021</p> <p>Completed</p>
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8	Partner Link Workers have the time and support to fulfil their duties effectively.	Agreed	<p>Action Plan November 2018</p> <p>CRCs accept the need to resource the Partner Link Workers (PLW) role sufficiently and a number have increased the number of PLWs and/or changed their delivery models to increase the available PLW resource. CRCs also recognise that staff awareness of the PLW role is critical and many CRCs are relaunching the service, simplifying the referral processes and setting in place performance frameworks to monitor delivery against the PLW Manual. CMTs will monitor these developments and encourage CRCs to provide dedicated support/clinical supervision for the PLW role.</p>	CRC Chief Executive Officers / CRC Contract Management Team	December 2018 June 2019
			<p>Update June 2019</p> <p>All CRCs have reviewed their resourcing of the Partner Link Worker role. In some cases, this has meant providing dedicated PLWs where these roles were previously combined and in some other CRCs additional staff have been recruited. For example, London CRC have commenced recruitment of Domestic Abuse Support Advisors (DASA). A number of CRCs have reviewed the line management arrangements for PLWs and put greater support/ clinical supervision in place. The PLW role is being promoted at workshops and forums both in CRCs and the NPS.</p> <p>Under the Probation Review, Innovation Partners will be required to ensure sufficient resource is provided to enable the quality delivery of the Partner Link Worker role, including the provision of appropriate line management support.</p>	CRC Chief Executive Officers / CRC Contract Management Team	Completed
			<p>Update November 2019</p> <p>Plans to require Probation Delivery Partners to ensure sufficient resource for the effective delivery of the Partner Link Worker role remain on track as described in June 2019 and include sufficient training, time and dedicated support and supervision for those undertaking the role of Partner Link Worker. In addition, IT solutions will provide confidential and secure recording of contact with partners and secure information sharing with the Responsible Officer.</p>	Deputy Director (Probation Review and Vulnerable Offenders team)	April 2021
				Deputy Director (Probation Review and Vulnerable Offenders team)	April 2021



