

## Action Plan Submitted: 20<sup>th</sup> December 2022.

## A Response to the HM Inspectorate of Probation Inspection:

- Hammersmith, Fulham, Kensington, Chelsea & Westminster (HFKCW) PDU.
- Ealing and Hillingdon (E&H) PDU.
- Lambeth PDU.
- Lewisham and Bromley (L&B) PDU.
- Newham PDU.
- Barking, Dagenham and Havering (BDH) PDU.

**Reports Published:** 18<sup>th</sup> October 2022 and 24<sup>th</sup> November 2022.



## INTRODUCTION

His 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<br>achieved along with timescales. Actions should be as SMART (Specific<br>Measurable, Achievable, Realistic and Time-bound) as possible.<br>Actions should be specific enough to be tracked for progress.  |  |
| Partly Agreed | Only part of the recommendation is<br>agreed with, is achievable, affordable<br>and will be implemented.<br>This might be because we cannot<br>implement the whole recommendation<br>because of commissioning, policy,<br>operational or affordability reasons. | The response must state clearly which part of the recommendation will<br>be implemented along with SMART actions and tracked for progress.<br>There <b>mus</b> t be an explanation of why we cannot fully agree the<br>recommendation - this must state clearly whether this is due to<br>commissioning, policy, operational or affordability reasons. |  |
| Not Agreed    | The recommendation is not agreed and<br>will not be implemented.<br>This might be because of<br>commissioning, policy, operational or<br>affordability reasons.   | The response must clearly state the reasons why we have chosen this option.<br>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: PROBATION SERVICE – Hammersmith, Fulham, Kensington, Chelsea and Westminster (HFKCW) PDU, Ealing and Hillingdon (E&H) PDU, Lambeth PDU, Lewisham and Bromley (L&B) PDU, Newham PDU and Barking, Dagenham and Havering (BDH) PDU, London Region.

| 1.<br>Rec<br>No | 2.<br>Recommendation  | 3.<br>Agreed/<br>Partly<br>Agreed/<br>Not Agreed | 4.<br>Response<br>Action Taken/Planned   | 5.<br>Responsible Owner   | 6.<br>Target Date |
|-----------------|---|--|--|---|-------------------|
| 1               | HFKCW, E&H,<br>Lambeth, L&B and<br>BDH PDUs should:<br>improve the quality of<br>work to assess, plan<br>for, manage and<br>review risk of harm.<br>AND<br>Newham PDU<br>should:<br>improve the quality of<br>work to assess, plan<br>for, manage and<br>review risk of harm<br>and to improve<br>desistance. | Agreed   | As part of the wider Regional Quality<br>Improvement Programme (QIP), all Senior<br>Probation Officers (SPOs) / Probation<br>Practitioners (PPs) will attend quality<br>development workshops designed to improve<br>practice standards across the Assess, Change<br>and Protect domains. These will provide input<br>designed to raise the quality of practice<br>regarding risk assessment and management,<br>including understanding of the four pillars of<br>Supervision, Monitoring & Control, Interventions<br>& Treatment and Victim Safety Planning and<br>building professional curiosity. Attendance will<br>be monitored by the Probation Delivery Unit<br>(PDU) and the wider region to ensure all<br>practitioners have attended as required. The<br>impact of the workshops will be measured<br>through continued used of the Regional Case<br>Audit Tool (RCAT) audit, Offender Assessment<br>System (OASys) countersigning and reflective<br>supervision. | Regional Probation Director<br>(RPD), Head of Operations<br>(HoOps) and Heads of PDU. | May 2023.         |
|                 |   |  | HMPPS & MoJ are taking forward an<br>Independent Review of London Probation,<br>which will complete by the end of December<br>2022. This will be led outside HMPPS by the  | RPD, HoOps and Director of<br>Planning & Performance,<br>MOJ.                         | December 2022.    |

|   |  |        | Director of Planning & Performance in the<br>Ministry of Justice and will ensure that HMPPS<br>takes every possible action to resolve<br>performance problems quickly.  |                         |                                |
|---|--|--------|---|-------------------------|--------------------------------|
| 2 | <ul> <li>HFKCW, Lambeth,<br/>E&amp;H, BDH and L&amp;B<br/>PDUs should:</li> <li>improve the<br/>effectiveness of<br/>quality assurance and<br/>management<br/>oversight of all<br/>casework.</li> <li>AND<br/>Newham PDU<br/>should:</li> <li>improve the<br/>effectiveness of<br/>quality assurance<br/>activity and consistent<br/>management<br/>oversight of all<br/>casework</li> </ul> | Agreed | <ul> <li>Following the concerns raised by HMI</li> <li>Probation, London Probation Service (PS) has commissioned an immediate, widespread RCAT auditing activity. This activity will ensure that each individual practitioner in London has a case audited by the end of January 2023 in order to give a benchmark of their practice and introduce the quality improvement activities which will follow in 2023. Additional staff have already been sourced for this activity.</li> <li>The national OASys Countersigning Framework is in use to provide consistency in OASys countersigning expectations for SPOs and PPs. At last count, 67% of staff had been assigned a status under the framework. The PDUs will ensure that all PPs not at approved status have increased levels of countersigning by the SPO in line with the framework and receive feedback on each assessment to understand areas for improvement. Where required, this will be supplemented by input from a Quality Development Officer (QDO), mentor or guidance documents to enhance understanding of practice requirements.</li> </ul> | HoOps.<br>Heads of PDU. | January 2023.<br>January 2023. |
|   |  |        | Touchpoint Model expectations for management oversight will be fully embedded within all PDUs by May 2023. As part of the   | HoOps and Heads of PDU. | May 2023.                      |

|   |   |        | overall QIP, a briefing on the Touchpoints<br>Model will take place for SPOs. Progress in<br>implementation will be measured through<br>management information which will track the<br>management oversight undertaken at different<br>points during the course of a sentence including<br>pre-release discussions, initial case<br>discussions, parole reports and lifer/IPP panels.<br>The PDU Head will oversee ongoing monitoring<br>of implementation through the use of the<br>dashboard data.<br>As per recommendation 1, upskilling of SPOs<br>will be a key part of the Regional QIP. Findings<br>of Quality Assurance (QA) activities will be<br>disseminated at the monthly Performance and<br>Quality Committee and overseen at the<br>Operational Leadership Group. London PS as<br>a whole will increase its number of QDOs as<br>agreed with the Chief Probation Officer. | Head of P&Q.   | May 2023.                            |
|---|---|--------|--|--|--------------------------------------|
| 3 | HFKCW, E&H,<br>Lambeth and L&B<br>PDUs should:<br>ensure that the<br>interventions<br>necessary to improve<br>desistance and<br>reduce reoffending<br>and risk of harm are<br>provided in all cases.<br>AND | Agreed | All SPO's and PP's will receive a briefing on<br>fulfilling the sentence of the Court; this will<br>include compliance, managing Rehabilitative<br>Activity Requirements (RARs) and referrals to<br>interventions.<br>Management Information System (MIS) data will<br>be reviewed in monthly manager meetings to<br>identify referral trends. Accountability will be<br>overseen at Operational Leadership Group<br>level.  | HoOp with responsibility for<br>Learning and Development.<br>Heads of PDU. | May 2023.<br>Commencing Feb<br>2023. |

|   | BDH PDU should:<br>ensure that<br>interventions<br>necessary to improve<br>desistance and<br>reduce reoffending<br>and risk of harm are<br>provided in all cases                 |        | Commissioned Rehabilitative Services (CRS)<br>providers and Interventions colleagues are<br>being invited to attend Team Briefings to<br>promote the services and programmes available<br>to practitioners.<br>A review will take place of planned<br>communications activity in relation to CRS and<br>interventions which was previously paused.   | Heads of PDU, Heads of<br>Interventions and Head of<br>Community Integration.<br>Head of Community<br>Integration. | Completed.<br>July 2023. |
|---|--|--------|--|--|--------------------------|
| 4 | Lambeth and BDH<br>PDUs should:<br>ensure that domestic<br>abuse and<br>safeguarding checks<br>are completed and<br>utilised to inform<br>assessment, planning                   | Agreed | Work on this has already been undertaken with<br>pan-London information sharing agreements<br>now in place with the Metropolitan Police.<br>Briefing from Head of Public Protection on<br>Police and Safeguarding checks took place in<br>September 2022 for SPO's and PDU Heads.<br>SPO's have cascaded this to PP's via team<br>meetings in October.   | Head of Public Protection.   | Completed.               |
|   | and risk<br>management.<br>AND<br>Newham PDU<br>should:<br>review the efficacy of<br>arrangements for<br>information sharing<br>regarding domestic<br>abuse and<br>safeguarding, |        | A follow up briefing by the Head of Public<br>Protection for practitioners (including those in<br>courts) was completed in November 2022. This<br>outlined when Police intelligence checks are<br>mandated by policy and desired as best<br>practice giving consideration to Metropolitan<br>Police thresholds. It also clarified Police sources<br>of intelligence with a focus on improving the<br>quality of the rationale, to ensure information<br>returned is fit for purpose and useful for risk<br>assessment / risk management. | Head of Public Protection.   | Completed.               |
|   | including use of<br>'SPOC' arrangements  |        | Management information relating to<br>Safeguarding and Police checks will be<br>provided by the Performance and Quality Team.  | Head of P&Q and Head of<br>Public Protection.  | December 2022.           |

| to oversee this activity. | A revamped dashboard relating to this will be<br>launched before the end of 2022, based on new<br>national reports created by EPSIG. The<br>dashboard will be rolled out in December 2022.<br>The Dashboard will Red Amber or Green (RAG)<br>rate cases and relevant cases where checks<br>have still not been carried out 1 month post<br>sentence will be marked for urgent action.<br>A briefing on Safeguarding will form part of the  |        | M         |
|---------------------------|--|--------|-----------|
|                           | QIP to be delivered to all PDU staff by May<br>2023; this also covers the training element<br>outlined in recommendation 8. The PDUs will<br>ensure that safeguarding and domestic abuse<br>checks are undertaken on all relevant cases in<br>line with the safeguarding policy expectation<br>and that the information is being used to inform<br>risk assessment. This will be monitored through<br>management information (as mentioned directly<br>above) which records whether a check has<br>been sent on all relevant cases. This data will<br>be shared at monthly performance meetings.<br>SPO's will follow up on any cases where the<br>check is outstanding. The use of the information<br>to inform risk assessments and risk<br>management will be monitored qualitatively<br>through OASys countersigning, touchpoint<br>discussions such as initial case discussion,<br>parole, risk reviews and RCAT/Assessment<br>Quality Assurance (AQA) auditing of cases<br>which looks at the quality of risk information and<br>practice. | HoOps. | May 2023. |

|   |   |        | All staff will complete the mandatory HMPPS<br>Child Safeguarding Training every 3 years as<br>required. Progress will be monitored through<br>local reports as well as oversight taking place at<br>the monthly Learning and Development<br>Committee chaired by the HoOp with overall<br>responsibility for Learning and Development<br>(L&D).   | HoOp with L&D responsibility. | Completed. |
|---|---|--------|--|-------------------------------|------------|
| 5 | <ul> <li>HFKCW PDU<br/>should:</li> <li>ensure staff with<br/>responsibility for case<br/>management<br/>oversight have the<br/>skills, knowledge and<br/>time to undertake the<br/>work effectively.</li> <li>AND</li> <li>E&amp;H and BDH PDUs<br/>should:</li> <li>ensure staff<br/>responsible for case<br/>management<br/>oversight have the<br/>skills, knowledge, and<br/>time to undertake the<br/>work effectively.</li> </ul> | Agreed | Touchpoint Model expectations for<br>management oversight will be fully embedded<br>within all PDUs by May 2023. As part of the<br>overall QIP, a briefing on the Touchpoints<br>Model will take place for SPOs. Progress in<br>implementation will be measured through<br>management information which will track the<br>management oversight undertaken at different<br>points during the course of a sentence including<br>pre-release discussions, initial case<br>discussions, parole reports, lifer/IPP panels.<br>The PDU Head will oversee ongoing monitoring<br>of implementation through the use of the<br>dashboard data.<br>As per recommendation 1, upskilling of SPOs<br>will be a key part of the Regional QIP. Findings<br>of QA activities will be disseminated at the<br>monthly Performance and Quality Committee<br>and overseen at the Operational Leadership<br>Group. London PS as a whole will increase its<br>number of QDOs as agreed with the Chief<br>Probation Officer. | HoOps & Heads of PDU.         | May 2023.  |

| 6 | HFKCW and E&H<br>PDUs should:<br>improve the<br>arrangements for<br>information sharing to<br>ensure that pre-<br>sentence domestic<br>abuse and<br>safeguarding<br>enquiries are<br>completed and<br>utilised to inform<br>assessment, planning<br>and risk<br>management. | Agreed | In addition to actions outlined against<br>Recommendation 4, court practice in HFKCW<br>and E&H will also be targeted through the QIP.   | HoOp with overall responsibility for L&D.                     | May 2023                        |
|---|---|--------|--|---|---------------------------------|
| 7 | HFKCW, Lambeth<br>and E&H PDUs<br>should:<br>engage with people<br>on probation to inform<br>service delivery.  | Agreed | All PDUs will conduct a People on Probation<br>(PoP) 'Your Voice Matters Survey' in November<br>2022 as part of the annual National PoP survey.<br>The results will be collated nationally, and once<br>local data is available priorities will be identified<br>from this to inform practice and service delivery.<br>Guidance on the OASys Self-Assessment | PDU Heads and National<br>Survey Team.<br>PDU Heads and SPOs. | February 2023.<br>January 2023. |
|   |   |        | Questionnaire will be reissued to PP's by SPOs,<br>following which SPOs will roll-back all<br>assessments where this is missing from<br>assessment.  |   |                                 |
|   |   |        | The PDU will implement a PoP suggestion<br>scheme via placement of a suggestion box in<br>Reception. Suggestions received will be<br>reviewed on a monthly basis as part of local  | PDU Heads.  | February 2023.                  |

|   |   |        | manager meetings (HFKCW & Ealing) or the People Group (Lambeth).   |  |                |
|---|---|--------|--|--|----------------|
| 8 | HFKCW PDU<br>should:<br>ensure staff have the<br>relevant training to<br>use risk and<br>safeguarding<br>information, obtained<br>from key  | Agreed | Work on this has already been undertaken with<br>pan-London information sharing agreements<br>now in place. Briefing from Head of Public<br>Protection on Police and Safeguarding checks<br>took place in September 2022 for SPO's and<br>PDU Head. SPO's have cascaded this to PP's<br>via team meetings in October 2022. | Head of Public Protection.                           | Completed.     |
|   | stakeholders, to<br>appropriately inform<br>risk assessment and<br>sentence plans for<br>people on probation.   |        | A follow up briefing by the Head of Public<br>Protection for practitioners (including those in<br>courts) was completed in November 2022. This<br>outlined when Police intelligence checks are<br>mandated by policy and desired as best   | Head of Public Protection.                           | Completed.     |
|   | AND<br>E&H PDU should:  |        | practice giving consideration to Metropolitan<br>Police thresholds. It also clarified Police sources<br>of intelligence with a focus on improving the<br>quality of the rationale, to ensure information   |  |                |
|   | ensure staff have the<br>relevant training to<br>use risk and<br>safeguarding<br>information, obtained<br>from key<br>stakeholders, to<br>appropriately inform<br>people on probation's |        | returned is fit for purpose and useful for risk<br>assessment / risk management.<br>Management information relating to<br>Safeguarding and Police checks will be<br>provided by the Performance and Quality Team.<br>A revamped dashboard relating to this will be<br>launched before the end of 2022, based on new        | Head of Public Protection,<br>Head of P&Q and HoOps. | February 2023. |
|   | risk assessment and<br>sentence plans.  |        | national reports created by EPSIG. The<br>dashboard is almost finalised and will be rolled<br>out in December 2022. The Dashboard will<br>RAG rate cases and relevant cases where  |  |                |

| post se<br>Checks<br>through<br>betwee<br>Region<br>account<br>safegua<br>reported<br>A briefin<br>QIP to b<br>2023. T<br>and dor<br>all relev<br>policy e<br>being u<br>be mon<br>(as mer<br>check h<br>data wil<br>meeting<br>where t<br>informa<br>manage<br>through<br>discuss<br>parole,<br>cases v | have still not been carried out 1 month<br>intence will be marked for urgent action.<br>not completed will be accounted for<br>monthly accountability meetings<br>in the HoOPs and their PDUs. The<br>is currently implementing a new<br>tability framework and<br>arding/domestic abuse checks will be<br>d on as part of this framework.<br>ng on Safeguarding will form part of the<br>be delivered to all PDU staff by May<br>The PDUs will ensure that safeguarding<br>mestic abuse checks are undertaken on<br>rant cases in line with the safeguarding<br>xpectation and that the information is<br>sed to inform risk assessment. This will<br>itored through management information<br>ntioned earlier) which records whether a<br>tas been sent on all relevant cases. This<br>I be shared at monthly performance<br>gs. SPO's will follow up on any cases<br>he check is outstanding. The use of the<br>tion to inform risk assessments and risk<br>ement will be monitored qualitatively<br>OASys countersigning, touchpoint<br>ions such as initial case discussion,<br>risk reviews and RCAT/AQA auditing of<br>which looks at the quality of risk<br>tion and practice. | HoOp overseeing Learning<br>and Development. | May 2023. |
|--|--|--|-----------|
|--|--|--|-----------|

|   | CW PDU should:   |        | <b>—</b>  |              |            |
|---|--|--------|---|--------------|------------|
| ) | complete all actions<br>identified as part of<br>the organisational<br>alert | Agreed | There is no longer an unallocated caseload in<br>HFKCW. All cases identified in the<br>organisational alert have been allocated to a<br>dedicated Probation Practitioner following<br>increased resources acquired in the immediate<br>aftermath of the Organisational Alert. Since the<br>alert, six Probation Officers and eight Probation<br>Service Officers have arrived on Detached Duty<br>and the PDU has also been allocated thirteen<br>Newly Qualified Officers. | Head of PDU. | Completed. |
|   |  |        | In order to avoid a reoccurrence of the issues<br>which resulted in the organisational alert, the<br>PDU has a process in place to monitor case<br>allocation. A report has been created that<br>checks for unallocated cases and this is<br>interrogated at monthly performance meetings<br>within the PDU.  | Head of PDU. | Completed. |
|   |  |        | Looking beyond the PDU, unallocated cases<br>are discussed at the Region-wide monthly<br>accountability meeting between HoOPs and<br>Heads of PDUs. This allows for greater<br>oversight of any PDU which may be building up<br>a concerning amount of unallocated cases.   | HoOps.       | Completed. |
|   |  |        | The Regional Demand Management Board sits<br>every 6-8 Weeks to review each PDU's<br>Prioritisation Framework (PF) status. This also<br>allows for regional oversight of PDUs which are<br>becoming Red Sites, giving a further potential<br>point of intervention before issues escalate.<br>This meeting also provides a foundation of data   | RPD.         | Completed. |

|             |   |        | for HoOPs to use when allocating new staff in<br>order to ensure they allocate to the PDUs most<br>in need.<br>An Urgent Strategic Review (USR) was<br>commissioned in the aftermath of the<br>Organisational Alert – the PDU holds a weekly<br>review meeting with the Chief Probation Officer<br>as part of this USR process including to account<br>for the Reporting Scheme for unallocated<br>cases. The PDU has informed the meeting that<br>the scheme has closed and there are no longer<br>any unallocated cases – it would be expected to<br>provide any updates if this was to change,<br>providing an extra layer of external oversight to<br>ensure there is no reoccurrence of the issues<br>which resulted in the Organisational Alert. | Chief Probation Officer.              | Completed.                      |
|-------------|---|--------|--|---------------------------------------|---------------------------------|
| Lambe<br>10 | eth PDU should:<br>ensure Rehabilitation<br>Activity Requirements<br>(RAR) are started<br>promptly and<br>recorded correctly. | Agreed | Head of Service delivered RAR briefing on RAR<br>criteria and how and when to record to all staff<br>in the PDU in November 2022. A review will be<br>completed in January 2023 on the RAR data to<br>identify any further development needs.<br>SPO's, Business Managers and Senior<br>Administrative Officers will use Delius MIS as<br>part of the monthly accountability meeting to<br>monitor the recording of RAR days within each<br>team for any developing trends to be addressed<br>by the line manager.   | Head of PDU.<br>Head of PDU and SPOs. | January 2023.<br>February 2023. |

|              |  |             | Whilst this has been listed as a specific<br>recommendation to Lambeth, all PDUs will<br>receive an uplift in this area via the Sentence<br>Management briefings which will include a focus<br>on RARs.  | HoOps.       | May 2023.  |
|--------------|--|-------------|--|--------------|------------|
| Barki        | ing, Dagenham and Ha   | vering shou | ıld:   |              | 1          |
| Barkii<br>11 | ensure that<br>Professional<br>Qualification in<br>Probation (PQiP)<br>learners have<br>appropriate<br>caseloads and<br>management<br>oversight to<br>undertake their work<br>effectively. | Agreed      | Alongside the general improvements targeted<br>for Management Oversight as mentioned<br>previously, BDH now has a permanent SPO<br>dedicated to managing PQiPs. Since the<br>inspection PQiP numbers have also reduced,<br>making this a more manageable expectation<br>Furthermore, there will be a national review and<br>comparison of the regionalised NQO support<br>packages for their scope, intensity and impact.<br>This is to include assurance that NQO's receive<br>the 0.8FTE workload reduction. PDU Head will<br>monitor local Workload Management Tool data<br>(with support from Learning and Development<br>team if required) to ensure that PQIPs are at<br>appropriate capacity. | PDU Head.    | Completed. |
|              | ensure the work<br>environment<br>promotes<br>professional<br>boundaries and<br>inclusivity for all staff.   | Agreed      | A revised Equality, Diversity Inclusion and<br>Belonging (EDIB) plan has already been<br>completed by BDH PDU in response to the<br>issues raised around inclusivity. This has been<br>overseen by the Head of PDU and assisted by<br>auditing work carried out by the Head of EDIB.<br>The Head of PDU has also held an all-staff call<br>to discuss issues arising from the inspection<br>and the Code of Conduct has been reissued to   | Head of PDU. | Completed. |

|       |  |  | all staff reminding them of behavioural expectations.   |                            |                |
|-------|--|--|---|----------------------------|----------------|
| Lewis | ham and Bromley PD   | U should:  |   |                            |                |
| 12    | ensure risk related<br>information is<br>obtained from and<br>shared with other<br>agencies in all<br>relevant cases to<br>support the<br>assessment and<br>management of risk<br>of harm.   | Agreed   | Work on this has already been undertaken with<br>pan-London information sharing agreements<br>now in place. Briefing from Head of Public<br>Protection on Police and Safeguarding checks<br>took place in September 2022 for SPO's and<br>PDU Head. SPO's have cascaded this to PP's<br>via team meetings in October 2022.    | Head of Public Protection. | Completed.     |
|       | of harm.<br>A follow up briefing by the Head of Public<br>Protection for practitioners (including those<br>courts) was completed in November 2022<br>outlined when Police intelligence checks<br>mandated by policy and desired as best<br>practice giving consideration to Metropoli<br>Police thresholds. It also clarified Police so<br>of intelligence with a focus on improving to<br>quality of the rationale, to ensure informator<br>returned is fit for purpose and useful for returned is fit for purpose and useful for fit for p | A follow up briefing by the Head of Public<br>Protection for practitioners (including those in<br>courts) was completed in November 2022. This<br>outlined when Police intelligence checks are<br>mandated by policy and desired as best<br>practice giving consideration to Metropolitan<br>Police thresholds. It also clarified Police sources<br>of intelligence with a focus on improving the<br>quality of the rationale, to ensure information<br>returned is fit for purpose and useful for risk<br>assessment / risk management. | Head of Performance and<br>Quality and Head of Public<br>Protection.  | Completed.                 |                |
|       |  |  | Management information relating to<br>Safeguarding and Police checks will be<br>provided by the Performance and Quality Team.<br>A revamped dashboard relating to this will be<br>launched before the end of 2022, based on new<br>national reports created by EPSIG. The<br>dashboard is almost finalised and will be rolled | Heads of PDU.              | December 2022. |

| out in December 2022. The Dashboard will<br>RAG rate cases and relevant cases where<br>checks have still not been carried out 1 month<br>post sentence will be marked for urgent action.Checks not completed will be accounted for<br>through monthly accountability meetings<br>between the HoOPs and their PDUs. The<br>Region is currently implementing a new<br>accountability framework and<br>safeguarding/domestic abuse checks will be<br>reported on as part of this framework.  |        |           |
|---|--------|-----------|
| A briefing on Safeguarding will form part of the<br>QIP to be delivered to all PDU staff by May<br>2023; this also covers the training element<br>outlined in recommendation 8. The PDUs will<br>ensure that safeguarding and domestic abuse<br>checks are undertaken on all relevant cases in<br>line with the safeguarding policy expectation<br>and that the information is being used to inform<br>risk assessment. This will be monitored through<br>management information (as mentioned directly<br>above) which records whether a check has<br>been sent on all relevant cases. This data will<br>be shared at monthly performance meetings.<br>SPO's will follow up on any cases where the<br>check is outstanding. The use of the information<br>to inform risk assessments and risk<br>management will be monitored qualitatively<br>through OASys countersigning, touchpoint<br>discussions such as initial case discussion,<br>parole, risk reviews and RCAT/AQA auditing of | HoOps. | May 2023. |

|    |   |        | cases which looks at the quality of risk information and practice.  |  |                          |
|----|---|--------|---|--|--------------------------|
| 13 | ensure sentence<br>management staff<br>receive the training<br>they need in order<br>to fulfil their roles<br>effectively.  | Agreed | The QIP as a whole addresses this area for the<br>entire region.Staff in all PDUs have to complete 70% of<br>Mandatory and Required Mixed Caseloads<br>Training by end of January 2023 and 100% by<br>end of March 2023. The Lewisham and<br>Bromley PDU is embedding Learning and<br>Development Slots into team meetings to allow<br>for reflections on the learning completed.   | HoOps.<br>HoOp with L&D lead and<br>Head of PDU. | May 2023.<br>March 2023. |
| 14 | ensure appropriate<br>management<br>information is<br>available to analyse<br>and consider any<br>potential<br>disproportionality in<br>the quality-of-service<br>delivery to people on<br>probation from ethnic<br>minority backgrounds. | Agreed | The PDU will build on the audit undertaken of all<br>people on probation aged 18-21 who are<br>managed within the PDU. This will be<br>completed, in order to ascertain any evidence of<br>structural disadvantage and disproportionality in<br>access to rehabilitative services. The PDU to<br>build on preliminary discussions held with local<br>authority providers (specifically Youth Offender<br>Services) to develop more seamless<br>approaches for those individuals transitioning to<br>adulthood | Head of PDU.                                     | January 2023             |
|    |   |        | The PDU will undertake an audit of the<br>integrated Offender Management cohort (IOM)<br>to understand the specific needs of the cohort<br>and the reasons for any disproportionality within<br>cohort demographics, with specific reference to<br>race. This audit will aid in the identifications of<br>any areas of improvement for people on  | Head of PDU.                                     | January 2023.            |

|      |  |        | probations access to interventions and<br>pathways aimed at supporting desistance<br>The above audits will then provide a foundation<br>for enacting a further deep dive into People on<br>Probation from ethnic minority backgrounds,<br>what disproportionalities they face and how<br>these can be addressed.  | Head of PDU. | April 2023.  |
|------|--|--------|---|--------------|--------------|
| Newh | am PDU should:   | 1      |   |              |              |
| 15   | ensure probation<br>practitioners always<br>consult and liaise with<br>all relevant services<br>when assessing,<br>planning, and<br>intervening with<br>people on probation. | Agreed | Management information in relation to CRS is<br>provided to all PDUs on a monthly basis.<br>Newham PDU will interrogate this data at<br>monthly management meetings as well as in<br>team briefings in order to ensure that<br>appropriate services are utilised. This activity<br>will take place in conjunction with the needs<br>analysis activity outlined in recommendation 17.<br>The PDU will also use existing contacts and<br>relationships with the CRS Contract<br>Management Team to flag up any issues or<br>concerns. | Head of PDU  | January 2023 |
| 16   | ensure consideration<br>of the safety of<br>victims in all<br>instances where<br>required.   | Agreed | Newham PDU has commenced monthly<br>surgeries with their allocated link Victim Liaison<br>Officer (VLO). These surgeries will address the<br>concerns raised by HMI Probation surrounding<br>safety of victims, which will include enhanced<br>monitoring as well as oversight by managers on<br>usage levels. The aforementioned QIP will<br>include a briefing on working with the Victim   | Head of PDU. | Completed.   |

|    |  |        | Contact Scheme to further strengthen this area of practice.   |   |             |
|----|--|--------|---|---|-------------|
| 17 | ensure probation<br>practitioners always<br>understand the<br>specific needs of<br>people on probation,<br>particularly regarding<br>protected<br>characteristics. | Agreed | The London PS Performance and Quality<br>Provides a needs analysis to all PDUs on a<br>yearly basis. This provides a snapshot of the<br>criminogenic needs prevalent in all PDUs,<br>allowing for more targeted commissioning and<br>utilisation of services at a local level. The<br>analysis also includes details of protected<br>characteristics in order to better understand the<br>needs of specific cohorts. Newham PDU will<br>utilise this data in order to more effectively co-<br>ordinate services for its People on Probation.  | Head of Performance and<br>Quality / Head of PDU. | April 2023. |
|    |  |        | The PDU will utilise data office closure days to<br>ensure that recording of needs and protected<br>characteristics is carried out and is accurate.<br>London Probation has also curated an Equality,<br>Diversity Inclusion and Belonging team with the<br>express intention of ensuring that London PS is<br>an inclusive organisation treating all People on<br>Probation with dignity and respect. Newham<br>PDU will work with a designated Equalities<br>Manager from the EDIB team in order to<br>address this recommendation, with particular<br>focus on the "Golden Thread" campaign which<br>looks at wider vulnerabilities as well as<br>protected characteristics. | Head of PDU                                       | May 2023.   |
|    |  |        | Oversight of this will take place at the Equalities<br>Board. The Board is chaired by the RPD and<br>meets every two months with one of its focus   |   |             |

|       |   |        | being to monitor responses to national and regional audits and inspections.   |   |               |
|-------|---|--------|---|---|---------------|
| 18    | review the efficacy of<br>work with people on<br>probation leaving<br>custody including the<br>efficacy and<br>availability of services<br>for this cohort. | Agreed | Newham PDU has set about implementing<br>changes to support individuals released from<br>custody, this will include holding a resettlement<br>panel on all custody cases within one year of<br>release. This will ensure that there is robust<br>oversight in monitoring that key markers have<br>been met and relevant referrals have been<br>made.  | Head of PDU.  | January 2023. |
| The L | ondon Region should:  |        |   |   |               |
| 19    | ensure priorities are<br>clearly communicated<br>and understood by<br>probation<br>practitioners and<br>middle managers<br>(HFKCW and E&H<br>PDUs).         | Agreed | Two all-staff calls have taken place in<br>September and November 2022 to reinforce the<br>principles of the PF as well as the importance of<br>adherence to these principles. Following this,<br>an item related to the PF has been included in<br>the December 2022 Regional Team Briefing<br>Pack to assist operational managers in<br>delivering local briefings to their teams. A<br>further staff call is planned in December 2022. | Regional Probation Director<br>/ HoOps.                         | Completed.    |
| 20    | ensure HFKCW has<br>sufficient staffing<br>resource in place.   | Agreed | London PS have worked closely with HMPPS<br>central recruitment to develop a Recruitment<br>and Retention plan. The plan sets out a<br>strategy and plan as to how to achieve target<br>staffing.   | London Head of Corporate<br>Services HMPPS<br>Recruitment Team. | Completed.    |
|       | ensure Lambeth PDU<br>has sufficient staffing<br>resource in place.   |        | The Region is tracking new starters and leavers<br>in order to project when sufficient staffing levels<br>will be realised. Current forecast is 80% of  | Regional Probation Director.                                    | August 2023.  |

|    | AND<br>ensure Lewisham and<br>Bromley PDU has<br>sufficient staffing<br>resource in place.<br>AND<br>ensure Barking,<br>Dagenham and<br>Havering PDU has<br>sufficient staffing<br>resources in place. |        | <ul> <li>target staffing for Probation Practitioners to be reached by August 2023. It should be noted that this is within the limits of what is achievable in light of market forces which are outside of HMPPS control and could impact on delivery timescale</li> <li>In relation to BDH, The Regional Leadership Team has endorsed a local recruitment plan for the PDU designed to increase Probation Service Officer (PSO) resources available.</li> <li>Four candidates have been sourced as agency workers to be placed in post and will be trained alongside existing PSOs to increase the pool of practitioners available to manage cases.</li> </ul> | Head of BDH PDU. | January 2023. |
|----|--|--------|--|------------------|---------------|
|    |  |        | HFKCW has received a number of new staff<br>through a mixture of detached duty (six<br>Probation Officers and eight Probation Service<br>Officers) and allocation of thirteen Newly<br>Qualified Officers. However further recruitment<br>will be needed once detached duty posts end.   | HoOp for HFCKW.  | Completed.    |
|    |  |        | London PS discuss recruitment at the regional<br>Workforce Planning Board which meets every<br>month and is chaired by HoOPs. The Board<br>tracks recruitment and retention against target<br>staffing and makes recommendations to the<br>People Board, chaired by the RPD.   | HoOp.            | Completed.    |
| 21 | ensure that<br>management  | Agreed | CRS management information is sent out<br>monthly to PDUs by the London PS Community   | Heads of PDU.    | January 2023. |

|    | information in relation<br>to Commissioned<br>Rehabilitative<br>Services (CRS)<br>referrals is available<br>for PDU managers<br>and analysed<br>effectively to increase<br>the use of available<br>services. (HFKCW<br>and Lambeth PDUs). |        | Integration Team. PDUs need to focus on<br>better integrating this data into local<br>management meetings and acting on the data.<br>Head of Performance and Quality and/or Head<br>of Community Integration will provide highlights<br>of CRS usage at monthly Operational<br>Leadership Group meetings, which are chaired<br>by the Regional Probation Director to ensure<br>regional oversight.  | Head of P&Q and Head of<br>Community Integration.<br>RPD. | March 2023.                      |
|----|---|--------|---|---|----------------------------------|
| 22 | increase quality<br>assurance activity at<br>a PDU level<br>(Lambeth, L&B and<br>BDH PDUs).<br><b>AND</b><br>review and increase<br>regional quality<br>assurance   | Agreed | Following the concerns raised by HMI<br>Probation, London PS has commissioned an<br>immediate, widespread RCAT auditing activity.<br>This activity will ensure that each individual<br>practitioner in London PS has a case audited by<br>the end of 2022 in order to give a benchmark of<br>their practice and introduce the quality<br>improvement activities which will follow in 2023.<br>London PS will audit two cases per practitioner   | HoOps.<br>Head of Performance &                           | December 2022.<br>December 2023. |
|    | arrangements and<br>activity (Newham<br>PDU).   |        | per year following an increase in QDO<br>resources.<br>The national OASys Countersigning Framework<br>is in use to provide consistency in OASys<br>countersigning expectations for SPOs and PPs.<br>At last count, 67% of staff had been assigned a<br>status under the framework. The PDUs will<br>ensure that all PPs not at approved status have<br>increased levels of countersigning by the SPO<br>in line with the framework and receive feedback<br>on each assessment to understand areas for | Quality.<br>Heads of PDU.                                 | January 2023.                    |

| improvement. Where required, this will be<br>supplemented by input from a QDO, mentor or<br>guidance documents to enhance understanding<br>of practice requirements.<br>Touchpoint Model expectations for<br>management oversight will be fully embedded<br>within all PDUs by May 2023. As part of the<br>overall QIP, a briefing on the Touchpoints<br>Model will take place for SPOs. Progress in<br>implementation will be measured through<br>management information which will track the<br>management oversight undertaken at different<br>points during the course of a sentence including<br>pre-release discussions, initial case<br>discussions, parole reports and lifer/IPP panels.<br>The PDU Head will oversee ongoing monitoring<br>of implementation through the use of the<br>dashboard data. | HoOps & Heads of PDU.  | May 2023.     |
|---|--|---------------|
| As per recommendation 1, upskilling of SPOs<br>will be a key part of the Regional QIP. Findings<br>of QA activities will be disseminated at the<br>monthly Performance and Quality Committee<br>and overseen at the Operational Leadership<br>Group. London PS as a whole will increase its<br>number of QDOs as agreed with the Chief<br>Probation Officer.  | Head of P&Q & HoOp with<br>responsibility for Learning<br>and Development. | May 2023.     |
| Regional assurance in terms of progress of<br>activities as well as impact of the work carried<br>out will be provided by the Head of Performance<br>and Quality at Operational Leadership Group<br>meetings, this will include interrogation of the<br>RCAT Dashboard which is being implemented<br>with support from the North East Region.   | Head of P&Q.   | January 2023. |

| 23 | Improve the  | Aarood           | Each DDL now has a Single Doint of Contact  | Heads of PDU.                              | Completed      |
|----|--|------------------|---|--|----------------|
| 23 | Improve the<br>completion rates of<br>accredited<br>programmes<br>(Lambeth PDU).   | Agreed           | Each PDU now has a Single Point of Contact<br>(SPOC) from the interventions team who<br>attends Management meetings, which take<br>place every month in which they review referral<br>and completion rates.   | Heads of PDU.                              | Completed.     |
|    | AND<br>Improve completion<br>rates for accredited<br>programmes<br>(Newham PDU)  |                  | Management Information with regard to<br>attendance at Programme sessions is also<br>included at district level accountability meetings,<br>which take place every month and are chaired<br>by HoOPs to help target specific Probation<br>Practitioners to help improve enforcement for<br>missed group sessions.   | Heads of Interventions.                    | February 2023. |
|    |  |                  | The Head of Interventions from each of the<br>PDUs along with the Head of P&Q will provide<br>regional assurance at the monthly Operational<br>Leadership Group meetings, which are chaired<br>by the RPD to ensure oversight of completion<br>rates and identify any areas of concerns /<br>issues with PDUs.  | Heads of Interventions and<br>Head of P&Q. | March 2023.    |
| 24 | ensure effective<br>arrangements are in<br>place with the<br>Metropolitan Police<br>Service to obtain and<br>share risk-related<br>information (L&B<br>PDU). | Partly<br>Agreed | This recommendation is partly agreed because<br>it requires the co-operation of an external<br>agency, which London PS do not have control<br>of. London PS Head of Public Protection is<br>holding monthly meetings with the Metropolitan<br>Police in order to address this issue. A position<br>statement has been agreed, the overall end<br>goal being that the London Probation Service<br>recruits eight members of staff to work<br>alongside the Metropolitan Police to complete | Head of Public Protection.                 | March 2023.    |

|    | ensure effective<br>arrangements are in<br>place with the<br>Metropolitan Police<br>Service to obtain and<br>share risk-related<br>information (BDH<br>PDU). |                  | all requested Police Intelligence Enquiries – six<br>of these eight staff have been appointed and<br>are waiting to pass vetting.  |  |               |
|----|--|------------------|--|--|---------------|
| 25 | complete all actions<br>identified in the<br>organisational alert<br>(HFKCW PDU).  | Agreed           | There is no longer an unallocated caseload in<br>HFKCW. All cases identified in the<br>organisational alert have been allocated to a<br>dedicated Probation Practitioner following<br>increased resources acquired in the immediate<br>aftermath of the Organisational Alert. Since the<br>alert, six Probation Officers and eight Probation<br>Service Officers have arrived on Detached Duty<br>and the PDU has also been allocated thirteen<br>Newly Qualified Officers.  | RPD, HoOp and Head of<br>PDU.                  | Completed.    |
| 26 | ensure housing<br>support services<br>provide an effective<br>service which meets<br>the needs of the<br>people on probation<br>(L&B).                       | Partly<br>Agreed | <ul> <li>This recommendation is partly agreed as<br/>London PS are unable to control the quality of<br/>service delivered by an external provider.<br/>However, where there are areas of concern<br/>these will be picked up with the provider via the<br/>appropriate mechanisms that are in place as<br/>well as via Head of Community Integration who<br/>attends regular meetings. London PS will<br/>ensure that PDUs feedback concerns through<br/>the Head of Community Integration.</li> <li>Community Accommodation Service Tier 3</li> </ul> |  |               |
|    |  |                  | provision will aim to ensure that all prison<br>leavers have 84 days of accommodation upon<br>release. Roll out is scheduled for January 2023  | Head of Community<br>Integration, Head of PDU. | January 2023. |

|    |   |        | and briefings will take place across PDUs to advertise the service and set expectations in terms of utilisation.   |              |            |
|----|---|--------|--|--------------|------------|
| 27 | review the location of<br>delivery sites for<br>unpaid work to<br>ensure they are<br>accessible for all<br>people on probation.<br>(Newham PDU).                        | Agreed | <ul> <li>The Unpaid Work (UPW) demand tool has been used to review coverage in Newham PDU and some shortfalls in particular areas have been identified. The Head of UPW has met with Newham Local Authority and the Metropolitan Police to discuss partnership working across the Borough in relation to increasing Unpaid Work projects and placements.</li> <li>Engagement is also ongoing with potential beneficiaries as well as increased recruitment to be able to staff any increase in projects.</li> </ul>  | Head of UPW. | June 2023. |
| 28 | strengthen multi-<br>agency public<br>protection<br>arrangements<br>(MAPPA) to ensure<br>there is consistency<br>in the arrangements<br>with local police (BDH<br>PDU). | Agreed | <ul> <li>MAPPA arrangements are progressing in the PDU. Police are present and inspection from the MAPPA Strategic Management Board was positive. There had been some disruption due to police staff changes, which have been discussed between the Police Borough Command Unit leadership and PDU Head of Service.</li> <li>A MAPPA co-chair is now in place from the Police and an established pathway has been implemented to escalate any issues. Issues can also be raised locally via reducing reoffending group that is chaired by Head of Service and meet every quarter.</li> </ul> | Head of PDU. | Completed. |

| His Ma | ajesty's Prisons & Proba   | tion Service | should:   |   |             |
|--------|--|--------------|---|---|-------------|
| 29     | consider incentives to<br>improve recruitment<br>and retention of staff<br>(HFKCW, Lambeth,<br>L&B and BDH PDU). | Agreed       | The offer of detached duty for PO's and PSO's to work in the PDUs for up to 12 weeks will be maintained. Keyworker housing schemes to incentivise recruitment and retention will be investigated. | Probation Workforce<br>Programme and Divisional<br>Head HR, HMPPS HR. | April 2023. |
|        | consider incentives to<br>improve recruitment<br>and staff retention<br>(E&H).                                   |              | The career pathways for staff approaching<br>retirement age will be relaunched, to allow them<br>to consider more flexible routes to remain within<br>the service.                                |   | March 2023. |
|        | AND<br>consider additional   |              | A refreshed exit interview process will be launched.  |   | April 2023. |
|        | incentives and<br>renumeration to<br>ensure good quality<br>staff are retained by<br>the service,                |              | A retention toolkit has been developed, which<br>will support regions to apply targeted<br>interventions to address local retention issue.  |   | Completed.  |
|        | particularly case<br>administrators<br>(Newham).   |              | MOJ Resourcing SPOC has been assigned to<br>support targeted recruitment activity within<br>London Region.  |   | Completed.  |
|        |  |              | The London Going Forward in Employment<br>(GFiE) campaign has been launched, to support<br>PSO recruitment in region  |   | Completed.  |
|        |  |              | MOJ resourcing led campaigns will support targeted recruitment into London (including   |   | Completed.  |

|    |   |        | <ul> <li>publicity, candidate engagement webinars, sifting and recruitment activity and community outreach activities)</li> <li>A flexible hours Case Administrator recruitment campaign targeting students will be coordinated.</li> <li>The 'Candidate Relationship Management (CRM)' has been introduced to increase high touch candidate engagement.</li> <li>Engagement with the Department of Work and Pensions (National Employer Partnership team) will support the development of a communications and advertising strategy.</li> </ul>   |  | Completed.<br>Completed.<br>Completed. |
|----|---|--------|--|--|--|
| 30 | improve the support<br>provision to sites<br>assessed as red<br>under the Prioritising<br>Probation Framework<br>(PPF) (HFKCW<br>PDU).<br><b>AND</b><br>improve the support<br>provided to sites<br>assessed as 'red'<br>under the Prioritising<br>Probation Framework<br>(PPF) (E&H PDU) | Agreed | <ul> <li>The Prioritisation Framework (PF) provides a consistent set of measures which local leaders can use to manage demand in their area responsive to local challenges.</li> <li>The Demand Management Committee will review all red requests to determine whether they fulfil required criteria. The Demand Management Committee will make recommendations to the Chief Probation Officer to endorse those decisions.</li> <li>HMPPS are responsive to requests to ensure the PF is up to date with developments. The Demand Management Committee will keep all red requests under review.</li> </ul> | Probation Workforce<br>Programme and Divisional<br>Head HR, HMPPS HR | Completed.                             |

| 31 | ensure that   | Agreed | The Probation Scorecard is designed to assess   | Deputy Director, Effective  | Completed and         |
|----|---|--------|---|---|-----------------------|
|    | performance<br>monitoring has a<br>greater emphasis on<br>the effectiveness and<br>quality of service<br>delivery. (Lambeth<br>and BDH PDU) |        | performance against statutory aims of probation<br>and our current & future priorities for probation.<br>It integrates a range of performance data<br>available to the business to tell more<br>comprehensive narrative than the previous<br>range of products. It forms part of a<br>comprehensive analytical narrative on probation<br>performance for ministers and HMPPS senior<br>leaders and is the mechanism by which<br>Probation Regional Directors are held to                                      | Practice Service<br>Improvement Group<br>(EPSIG) & Head of<br>Assurance, Risk<br>Management &<br>Governance.<br>Head of P&Q, London<br>Probation Service. | ongoing.              |
|    |   |        | account for performance.<br>The probation performance framework for the<br>unified model places an increased focus on<br>quality and outcomes. HMI Probation and<br>OSAG are central to the new framework. It<br>supports a focus on quality, through four core<br>quality measures; to ensure sufficient planning,<br>enforcement, risk management and delivery of<br>the sentence. The key principles focus on<br>quality rather than processes and on outcomes<br>linked to reducing reoffending and harm. |   | Completed.            |
|    |   |        | OSAG produced a baseline rating across the<br>quality measures for 2021 and are now<br>undertaking their second year of assurance of<br>the quality of practice in London Probation from<br>which progress can be measured. This annual<br>audit provides the quality ratings for the<br>Probation scorecard.   |   | Completed and annual. |

|    |  |                  | Between the annual audit cycle, London<br>Probation have launched the Regional Case<br>Audit Tool, which is an audit tool designed by<br>OSAG to be used at nearest point of delivery to<br>drive the quality of performance in a targeted<br>way at a local level.  |   | January 2023  |
|----|--|------------------|--|---|---------------|
| 32 | ensure sufficient face-<br>to-face and onsite<br>delivery is undertaken<br>to provide effective<br>supervision and risk<br>management of<br>people on probation.<br>(E&H)                    | Agreed           | In September 2022 the revised smarter working<br>toolkit was launched across probation. Within<br>that toolkit the most significant revision was the<br>inclusion of a new expectation that the majority<br>of the working week was spent in the office in<br>support of face-to-face contact with People on<br>Probation. The toolkit was approved by unions,<br>regional probation directors and launched with<br>support from the Chief Probation Officer and<br>Director General for Probation and support in<br>embedding the changes is being managed by<br>regional Business Strategy and Change teams. | Deputy Director for<br>Business Strategy and<br>Change. | Completed.    |
|    |  |                  | The London Regional QIP will define how the Smarter Working Policy will be implemented in London to fit the Region's needs.  | HoOps.  | January 2023. |
| 33 | encourage the<br>Ministry of Justice to<br>continue funding the<br>Young Adult<br>Transitions Hub pilot<br>and ensure all good<br>practice identified by<br>Sheffield Hallam<br>University's | Partly<br>Agreed | The Young Adult Transitions Hub pilot is an<br>important project that has already showed<br>positive findings and we welcome the findings<br>from the HMIP review. HMPPS support the<br>principle in the recommendation for the project<br>to be extended beyond the current funding<br>period. This recommendation is partly agreed<br>because the project is currently funded from the<br>government Shared Outcomes Fund and  | Deputy Director, Youth<br>Justice and Offender Policy.  | March 2023.   |

| evaluation is<br>disseminated<br>nationally (Newham). |
|---|
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| Recommendations |    |
|-----------------|----|
| Agreed          | 30 |
| Partly Agreed   | 3  |
| Not Agreed      | 0  |
| Total           | 33 |

