



HM Prison &
Probation Service



**COUNTER
TERRORISM
POLICING**

Action Plan Submitted: 28 July 2023

Updated Action Plan Submitted: 11 October 2023

A Response to: **Counter Terrorism Joint Inspection – National security division and multi-agency arrangements for the management of terrorist offenders in the wake of terrorist attacks**

Report Published: 20 July 2023

INTRODUCTION

HM Inspectorate of Prisons (HMIP) and HM Inspectorate of Probation for England and Wales are independent inspectorates which provide scrutiny of the conditions for, and treatment of prisoners and offenders. They report their findings for prisons, Young Offender Institutions, and effectiveness of the work of probation, and youth offending services across England and Wales to Ministry of Justice (MoJ) and Her Majesty's Prison and Probation Service (HMPPS). 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 provide 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 sent to HMIP and published on the GOV.UK website. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

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



Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
------------	--	--



ACTION PLAN: Counter Terrorism Joint Inspection – National security division and multi-agency arrangements for the management of terrorist offenders in the wake of terrorist attacks.

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	The Ministry of Justice should:				
1	Commission storage systems capable of storing up to secret classified information to ensure that the National Security Division is able to safely record organisational decision-making and agreed actions following the disclosure of secret information.	Agreed	HMPPS will develop a strategic business case for improving HMPPS' access to high side technology so that the agency can work effectively with national security partners to manage risk. The proposed structure of this work will first address the most acute risks and capability gaps, including in the National Security Division (NSD), before engaging MOJ as a partner in the broader cross-system programmes of high-side technology roll-out. The business case will be completed by the end of 2023-24 with implementation dependant on the roll out and initial findings.	Deputy Director Joint Extremism Unit (JEXU)	March 2024
2	Provide video and telephone technology to the National Security Division that is capable of sending and receiving secret level information.	Agreed	HMPPS will develop a strategic business case for improving HMPPS' access to high side technology so that the agency can work effectively with national security partners to manage risk. The proposed structure of this work will first address the most acute risks and capability gaps, including in NSD, before engaging MOJ as a partner in the broader cross-system programmes of high-side technology roll-out. The business case will be completed by the end of 2023-24 with implementation dependant on the roll out and initial findings.	Deputy Director Joint Extremism Unit (JEXU)	March 2024
	The Home Office and Ministry of Justice should:				
3	Commission the development of an efficient and effective Counter Terrorism Nominal Management case management system that enables all users to process a case through	Agreed	All partners – Home Office; Counter Terrorism (CT) Police; HMPPS – are committed to developing Multi Agency Public Protection System (MAPPS) so that it fully addresses the gaps and weaknesses inherent in the current National	SRO MAPPS Programme	July 2025



	full lifetime management. The system should also enable the collection, analysis and reporting of appropriate performance and management information. The Multi Agency Public Protection System (MAPPS) should be reviewed to consider whether it meets these needs.		Dangerous Persons' Database (VISOR) system and provides an effective cross-system case management system for lifetime nominal management. The Multi Agency Public Protection System (MAPPS) programme is expected to launch in July 2025.	T/Det Supt CT Nominal Management Deputy Director Joint Extremism Unit (JEXU)	
	His Majesty's Prison and Probation Service should:				
4	Review the current practice of requiring all terrorist and terrorist risk cases to be heard at level three MAPPA meetings for a minimum of 12 months, making the approach more responsive to presenting risk and the professional judgement of MAPPA panels, and ensure the model is sustainable going forward.	Agreed	A change to this practice will require ministerial approval. A paper is in the process of being submitted to Ministers which requests that the current arrangement which requires all terrorist offenders to be managed at Multi Agency Public Protection Arrangements (MAPPA) Level 3 for the first 12 months post release from custody be reviewed. This would enable the National Security Division (NSD) to decide on a case-by-case basis the required MAPPA level based on assessments of risk.	Probation Director National Security Division	August 2023
5	Develop a bespoke tool for measuring performance against enhanced national standards.	Agreed	Effective Practice and Service Improvement Group (EPSIG) in HMPPS and MOJ Data & Analysis will develop a Performance Framework for the NSD which will include service levels for both Enhanced National Standards and those relevant to General National Standards for NSD cohorts. Work on the new measures have commenced with an agreed order of priority and is estimated to take approximately six months.	Deputy Director Effective Practice and Service Improvement Group	April 2024
	The Joint Extremism Unit should:				
6	Strengthen leadership and practice through publishing an updated operational framework for managing terrorist and terrorist risk cases for probation and prison practitioners.	Agreed	The Managing Extremism Policy Framework (MEPF) is currently in the process of being reviewed and updated. A large body of Standard Operating Procedures (SOPs) have been produced since 2019, which provide essential guidance for frontline practitioners concerned with CT Operational Delivery. The Joint Extremism Unit (JEXU) will review the operational framework to ensure the overarching policy reflects current legislation and make it simpler for practitioners to navigate a complex landscape of operational policy.	Deputy Director Joint Extremism Unit (JEXU)	June 2024



7	Review whether access to the Pathfinder Guidance Framework should be permitted to all staff holding terrorist risk cases.	Agreed	<p>This action will be delivered by the JEXU Operational Delivery Team who will consult with the CT Assessment & Rehabilitation Centre (CTARC) as necessary on the following.</p> <ul style="list-style-type: none"> • Interim handling instructions to be agreed and published whilst the Pathfinder Guidance Framework (PGF) Standard Operating Procedure (SOP) is reviewed, and new handling instructions included. • Communications to be sent to all Prison Prevent Leads (PPLs) and Counter Terrorism Specialist Probation Practitioners (CTSP) to ensure they are aware of the change in handling instructions, pending a new SOP being published and the need to share the PGF with Prison Offender Managers (POMs) and Community Offender Managers (COMs). • Review of the PGF SOP to ensure that handling instructions support the PGF in full and/or the information sheet is shared in every case with practitioners holding Terrorist Risk (TR) cases. To support appropriate use of the PGF this will always be done with the support of the PPL/CTSP. • Workshops to be designed and delivered to CTSPs and PPLs to support their understanding of the need to share PGFs with Probation Practitioners (PPs) and how to do this/how the PGF can be used to inform assessment such as Offender Assessment System (OASys) without being referred to. • Workshops to be designed and delivered to NSD Specialist Probation Practitioners (SPPs), PPs in Probation regions holding TR cases and relevant POMs to support their understanding of the PGF. These will be recorded so that they can be shared with staff at the point of need when they become responsible for a TR case. 	Deputy Director Joint Extremism Unit (JEXU)	<p>September 2023</p> <p>September 2023</p> <p>December 2023</p> <p>April 2024</p> <p>April 2024</p>
8	Set out how to incorporate the Pathfinder Guidance Framework assessments into the Offender Assessment System to inform risk management and sentence planning for terrorist risk cases.	Agreed	Guidance to support Counter Terrorism Specialist Probation Practitioners and Prison Prevent Leads around sharing the Pathfinder Guidance Framework (PGF) with POM's and COM's will be issued to be completed with additional guidance which can be shared with POMs and COMs to support their understanding and use of the PGF. The guidance will be written collaboratively by CT Operational Network Subject Matter Experts (SME) and CTARC.	Deputy Director Joint Extremism Unit (JEXU)	December 2023



			<p>Guidance will be circulated for the completion of OASys for terrorist and terrorist risk cases by Probation CT Teams.</p> <p>The assurance of PGF being shared will be incorporated into the CT Quality Development Tool. This will initially be in the Pathfinder Information Technology (PFIT) section of the community tool, with a specific PGF question (relating to nDelius contact) to be added in the next annual review.</p>		<p>August 2023</p> <p>May 2024</p>
9	Revise the control and interventions matrix, to be more sensitive to levels of presenting risk.	Agreed	<p>The Counter Terrorism Assessment & Rehabilitation Centre (CT-ARC) have scheduled a formal review of the Control & Interventions Matrix (CIM).</p> <p>Revised guidance will be published for use of the CIM by CT operational network staff.</p> <p>The CIM will be revised by initially interrogating available CIM data relating to Pathfinder nominals, which includes a review of the suitability of current risk levels. A scoping exercise, including practitioner forums, will be led by CTARC – this work will commence the end of 2023 and run into the beginning of 2024. Updates regarding findings will be shared at the CT Prisons and CT Probation Boards by June 2024. Evidence gained from the scoping exercise will then inform the development of a new tool which will be rigorously piloted with JEXU's CT operational networks.</p> <p>The roll out of the final version of the new tool is scheduled for 2025.</p> <p>The timescales relating to the re-development of the CIM (and risk levels) will be guided by the wider Pathfinder Reform work being undertaken by JEXU and other work commitments and priorities in CT-ARC.</p> <p>There will be a prioritisation framework in place to help with project prioritisation and allocation of CT-ARC resources. As part of the proposed Pathfinder Reform Programme, consideration will be given to ensuring that the control and interventions matrix is reviewed and revised to align with a shared, multi-agency definition of terrorist risk and that they represent a more nuanced levels of presenting risk.</p>	SRO CT Assessment & Rehabilitation Centre (CTARC)	<p>Completed</p> <p>August 2023</p> <p>June 2024</p> <p>June 2025</p>
10	Analyse the rate and quality of referrals into Pathfinder, by Probation Service, to ensure terrorist risks are being identified and	Agreed	JEXU's Assurance Team will conduct a thematic with a focus on referrals and the validation process (acceptance or rejection) into Pathfinder thereafter.	Deputy Director Joint Extremism Unit (JEXU)	November 2023



	appropriate actions being taken in all relevant cases.		<p>The thematic will be scoped in full in September but is likely to include a data sample containing referrals from at least one quarter, covering a cross section of regions, in prison and the community, to review cases adopted as well as those for no further action. Methodology (to be confirmed in September) will include self-assessment questionnaires, semi-structured interviews as well as a full review of the data sample (e.g., case records, meeting minutes, intelligence reports).</p> <p>This will be added into an ongoing schedule of thematic exercises held by JEXU's Assurance Team. The proposal is to commence this thematic at the beginning of September 2023 and conduct over a 12-week period.</p>		
11	Ensure that the training given to prison offender managers and keyworkers equips them to confidently manage terrorists and those who present a terrorist risk.	Agreed	<p>This recommendation will be addressed through the redevelopment of the current CT training offer across HMPPS being led by JEXU CT Learning & Development.</p> <p>The new training package (available to prison offender managers and keyworkers) will be focused on providing awareness and upskilling staff to confidently spot the signs of radicalisation and changes in behaviour, and the appropriate mechanisms for reporting these concerns, to effectively manage terrorists and those who present a terrorist risk.</p> <p>In addition to the new CT training offer, JEXU CT Networks have also completed the Level 7 Advanced Certificate in CT, which will enable them to better support front line staff to ensure they can confidently manage the risks.</p> <p>The new training package is due to be rolled out across HMPPS by December 2023.</p>	Deputy Director Joint Extremism Unit (JEXU)	December 2023
	The Probation Service should:				
12	Ensure domestic abuse and appropriate safeguarding enquiries are made in all cases at key transitional periods and use this information to inform risk management and sentence planning.	Agreed	<p>Steps have been taken to drive up domestic abuse and safeguarding enquiries carried out by the National Security Division (NSD). NSD Practitioners, supported by administrative staff, have ensured that enquiries are complete for all eligible cases in the NSD caseload, this has been monitored via monthly data reports. The NSD has made significant progress and nearly all cases in the community now have enquiries recorded on nDelius. This will continue to be monitored monthly.</p>	Probation Director National Security Division	Completed and ongoing



			<p>The national OMiC team have committed to using evidence, data and learning to review and develop the current OMiC model to maximise the opportunity to deliver better outcomes for prisoners. This will include reviewing Key Work and case management, exploring ways in which the current model can be made more flexible to better support delivery, taking into consideration different prison functions and prisoner cohorts. Changes made will seek to develop constructive motivational relationships with prisoners, respond to individuals' risk and needs, and properly co-ordinate the delivery of services and interventions in custody.</p> <p>Whilst this review is underway, every prison has developed a regime progression plan that represents the regime that each prison aspires to build towards and deliver during 2023/24. These plans must consider a commitment to deliver key work and where delivery against the model as currently prescribed is not possible, for example because of resourcing issues, prisons will need to agree the level of key work they will aspire to achieve with the Prison Group Director.</p> <p>Additionally, a project to review the allocation of prison level resources has been commissioned, this project will support effective profiling, resourcing, and management oversight of key work. Alongside this project, work is underway to improve resource management through the piloting of a new staff rostering tool and through a new workforce transformation programme to improve staff skills and capability. Benefits from this longer-term activity will require system change and are unlikely to be seen prior to June 2024.</p>	Deputy Director Resource and Process Group	<p>April 2024</p> <p>Completed</p> <p>June 2024</p>
16	Prioritise basic extremism training for all frontline staff, including refresher training, where required.	Partly Agreed	<p>The recommendation is partly agreed for operational reasons. Whilst the current CT training package in prisons, Awareness for Staff on Prevent Extremism and the Counter Terrorism Strategy (ASPECTS) has recently been identified as one of the key safety and security training interventions that should be given priority, it is not mandatory and is at the discretion of the Governing Governor and Prison Group Directors to make staff available for this training.</p> <p>However, as part of the new redevelopment of the CT training offer, JEXU CT Learning & Development (L&D) are investigating options for the new CT training package to be made mandatory across HMPPS.</p> <p>To further assist establishments with the delivery of ASPECTS, JEXU has also provided all establishments with two training laptops that can be used to assist with the remote delivery of ASPECTS to help improve completion rates.</p>	Deputy Director Joint Extremism Unit (JEXU)	December 2023



			<p>Refresher training will be provided for the new CT training package in the form of an e-learning refresher module, to help enable establishments and staff to prioritise CT training more easily.</p> <p>CT L&D also monitor training figures on MyLearning and will provide routine reports to the CT Prisons and Probation Board, to help ensure CT training is being prioritised.</p> <p>The new training package is due to be rolled out across HMPPS by December 2023.</p>		
17	Ensure prison offender managers have access to all relevant and up-to-date information relating to terrorist risk concerns to support robust case management.	Agreed	<p>This action will be delivered by the Joint Extremism Unit (JEXU) Operational Delivery Team who will consult with the Counter Terrorism Assessment and Rehabilitation Centre (CT-ARC) as necessary on the following.</p> <ul style="list-style-type: none"> • Interim handling instructions to be agreed and published whilst the Pathfinder Guidance Framework (PGF) Standard Operating Procedure (SOP) is reviewed, and new handling instructions included. • Communications to be sent to all Prison Prevent Leads (PPLs) and Counter Terrorism Specialist Probation Practitioners (CTSPPs) to ensure they are aware of the change in handling instructions, pending a new SOP being published and the need to share the PGF with Prison Offender Managers (POMs) and Community Offender Managers (COMs). • Review of the PGF SOP to ensure that handling instructions support the PGF in full and/or the information sheet is shared in every case with practitioners holding Terrorist Risk (TR) cases. To support appropriate use of the PGF this will always be done with the support of the PPL/CTSPP. • Workshops to be designed and delivered to CTSPPs and PPLs to support their understanding of the need to share PGFs with PPs and how to do this/how the PGF can be used to inform assessment such as Offender Assessment System (OASys) without being referred to. • Workshops to be designed and delivered to NSD Probation Practitioners (PPs) in Probation regions holding TR cases and relevant POMs to support their understanding of the PGF. These will be recorded so that they can be shared with staff at the point of need when they become responsible for a TR case. 	Deputy Director Joint Extremism Unit (JEXU)	<p>September 2023</p> <p>September 2023</p> <p>December 2023</p> <p>April 2024</p> <p>April 2024</p>



			<ul style="list-style-type: none"> Guidance to support CTSPPs and PPLs sharing the PGF with POMs and COMs to be completed with additional guidance which can be shared with POMs and COMs to support their understanding and use of the PGF. Circulation of guidance for the completion of OASys for terrorist and terrorist risk cases by Regional Prison CT (RCT) Teams to Offender Management Unit (OMU) staff. Assurance PGF is being shared will be incorporated into the CT Quality Development Tool – initially in the Pathfinder Information technology (PFIT) section of the community Tool – specific PGF question (relating to Delius contact) to be added in next annual review. <p>As part of the proposed Pathfinder Reform Programme, consideration will be given to ensuring information pertaining to terrorist risk concerns is effectively and efficiently shared with all relevant stakeholders involved in the case management of a prisoner, including offender managers (to be confirmed by Pathfinder Reform Programme Board by end of August 2023).</p>		<p>December 2023</p> <p>May 2024</p>
18	Ensure risk management and sentence plans are informed by the most recent Extremist Risk Guidance or Pathfinder Framework Guidance assessment.	Agreed	<p>Guidance will be re-circulated for the completion of OASys for terrorist and terrorist risk cases by Regional Counter Terrorism (RCT) Teams to Offender Management Unit (OMU) staff, which includes details of how specialist assessment tools (including Pathfinder Guidance Framework (PGF) and Extremism Risk Guidance (ERG) should inform the Offender Assessment System (OASys) risk assessment, risk management plan and sentence plan.</p> <p>New expectations for ERG authors will include a requirement to share a copy of the ERG with Prison Offender Managers (POMs) – this requirement will be added to the ERG Standard Operating Procedure. This is in addition to saving a copy of the ERG on Pathfinder IT and N-Delius.</p> <p>Use of the Counter Terrorism Development Tool (CTQDT) – Custody, which rolled out nationally on 3 July will assure this work is being completed. Where it is identified this is not happening there will be a mechanism, via RCT Teams, to address it.</p>	Deputy Director Joint Extremism Unit (JEXU)	August 2023
Counter Terrorism Policing:					
19	The senior national coordinator should review the Registered Terrorism Offender	Agreed	This recommendation will be taken to a future National Risk Assessment Working Group and considered alongside a current pilot to widen usage across a higher percentage of the Counter Terrorism Nominal Management cohort.	T/Det Supt CT Nominal Management	April 2024



	Assessment Framework process to ensure that it is fit for police-led cases.		The terms of any proposed pilot will be presented to the Senior National Coordinator for sign off upon completion.		
20	The senior national coordinator should work with the National Security Division and Joint Extremism Unit to develop and implement a risk assessment process for those tasked with visiting counter terrorism nominals in the community.	Agreed	<p>This recommendation will be taken to a future National Risk Assessment Working Group with a request for a multi-agency working group to be established to draft a risk assessment process. The terms of reference will require the working group to draw from existing best practice already within the CT system both within Counter Terrorism Police (CTP) and HMPPS, as well as looking to any relevant expertise within wider offender management outside of CT. The terms of reference will also require consideration to be given to whether the assessment should be piloted prior to implementation.</p> <p>The assessment process, including the terms of any proposed pilot, will be presented to the Senior National Coordinator for sign off upon completion.</p>	T/Det Supt CT Nominal Management	April 2024
21	The Head of Interventions (Prevent & Nominal Management) should ensure that guidance is issued to regional Counter Terrorism Nominal Management teams that sets out a consistent use of ViSOR to support Counter Terrorism Nominal Management in the period before MAPPS is implemented and in any transition that may follow.	Agreed	This recommendation will be addressed by the Counter Terrorism Police Headquarters Interventions Policy team who will draft appropriate guidance, drawing on existing expertise from both HMPPS and front-line policing colleagues.	T/Det Supt CT Nominal Management	April 2024

Recommendations	
Agreed	20
Partly Agreed	1
Not Agreed	0
Total	21

