

Action Plan Submitted: 23 May 2024

A Response to: Joint Inspection - The quality of work undertaken with women.

Report Published: 23 May 2024

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 (Specifi 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 mus t 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: Joint Inspection - The quality of work undertaken with women.

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	For prisons and probation, F	lis Majesty's P	rison and Probation Service should:		•
1	Ensure that all staff involved in women's resettlement and sentence delivery have access to all relevant case management and assessment systems, including nDelius, NOMIS and OASys.	Partly Agreed	The recommendation is partly agreed, whilst HMPPS agree that all staff involved in women's resettlement and sentence delivery should have access to all the information needed to enable them to successfully carry out this, the long-term ambition is to have a set of modern digital services to provide the right information at the right time. For resettlement and sentence delivery the primary vehicles for doing this will be: Prepare Someone for Release Service Refer and Monitor an Intervention New digital services being developed under the Assess, Risk & Needs Project. HMPPS will work with CRS providers to understand what additional information is required and will then consider if and how this can be provided. Prepare Someone for Release is the start of the replacement to Basic Custody Screening Tool (BCST). Currently, the information needed to assess the suitability of a prisoner's release plans sits in multiple different systems and spreadsheets such as NOMIS, Delius, OASys. The information is required by lots of members of staff, but is cumbersome to gather, and sometimes sitting in systems that staff cannot easily access. HMPPS are developing two services one for staff and one for prison leavers. These will organise, plan and record relevant information around the resettlement pathways of mental health, drugs, education, skills, work, accommodation and family ties to address drivers of repeat offending and ensure a smooth transition into the community. This should lead to improved information sharing, improved coordination, sequencing	Deputy Director Probation Digital SRO for Electronic Monitoring and Commissioned Rehabilitative Services Deputy Director Prison Digital	December 2024 December 2024

			and oversight of resettlement activity. This will empower prison leavers to better engage with services. Refer and Monitor an Intervention is an existing digital service that provides up to date, accurate and relevant information to the provider at the point of referral with the Probation Practitioner and CRS Provider communicating as required for the duration of the intervention.	Deputy Director Probation Digital	March 2025
			HMPPS are commencing further development of Refer and Monitor in 2024/2025 to add more value through a common referral process. This aims to establish a core set of data that will form the basis for all referrals, regardless of intervention type and setting. In doing so, HMPPS are taking advantage of better aggregated data, which is stored across NOMIS, Delius, OASys and other services. Not only will the access to data be more comprehensive, but it will also be updated in real time.		
			The Assessing Risks, Needs and Strengths (ARNS) project will deliver an organisational change in the approach to how assessments, risk management and sentence planning is undertaken. This will include capturing information and progressing it more dynamically, supported by a new enabling digital service.	Head of Strategy and Delivery - Assessing Risks, Needs and Strengths Project.	August 2026
			An early version of ARNS will be tested initially with a small staff cohort in August 2024. Whilst beginning to create practice change via a new question set and functionality, this version will not realise full project benefits. The ARNS project will take a step wise iterative approach to achieving transformative change on assessment and sentence planning learning quickly from early pilot evaluation. The end state product will be introduced and rolled out to staff in probation and prisons during 2026.		
2	Ensure that all practitioners in prison and the community fully understand how traumatic events can affect women's behaviour and are confident that they know how best to respond to women's risks and needs.	Agreed	The eLearning package Empowering change: Working Well with Women is available to all probation practitioners and will be required learning for those new into the role (to be completed within the first six months). There is also a broad range of learning on the HMPPS Intranet for practitioners working with women, which contains information, guidance, research and other learning materials.	Deputy Director, Talent, Learning and Leadership	Completed
			All new Prison Officers, apart from in exceptional personal circumstances, who are allocated to establishments within the Women's Group are placed onto the	Head of HR	June 2024

			Women's Estate Foundation Course (WEST). An online custody specific version of Empowering change: Working Well with Women is due to be launched in June 2024. There is also a Pregnancy and Perinatal Care in Prisons eLearning package, available to all staff on MyLearning. A Trauma-Informed Strategy is currently being drafted for Women's Group, to address the recommendations from a recently completed PhD which has explored the barriers and enablers to trauma-informed care from the perspectives of women in prison and prison officers. These recommendations are wide-ranging, and encompass training, as well as other actions which will positively impact the ability of the organisation to provide trauma-informed care for women.	MOJ People Group Womens Directorate Women's Group Lead Psychologist	August 2024
3	Evaluate all interventions being used with women to properly understand their impact.	Partly Agreed	This recommendation is partly agreed as whilst future research priorities are still to be determined, it is not possible for HMPPS to commit to evaluating all women's interventions. In 2023, however, HMPPS published two evaluations on Accredited Programmes (suitable for men and women aged 18 plus) which were. • An impact evaluation of the prison-based Thinking Skills Programme (TSP) on prison misconduct, and • An impact evaluation of the prison-based Thinking Skills Programme (TSP) on reoffending. In addition to these quantitative studies, HMPPS has commissioned a	Director Date and	hala 2004
			qualitative study exploring the views of TSP participants, including women. Final reports are due in 2024, followed by Government Social Research publication. A separate process evaluation has also been commissioned externally for structured interventions which is being completed by Huddersfield University. This includes Managing My Emotions, Better Solutions, Stepwise Emotions, and Stepwise Problem Solving – to be published as Government Social Research.	Director, Data and Analysis Head of Evaluation for Commissioned Rehabilitative Services and Rehabilitation Activity Requirements	July 2024 September 2024
			The new policy framework, the National Framework for Interventions (NFI) was published in December 2023. This policy sets out the HMPPS definition of an intervention as any structured, replicable, psychologically informed work that aims to address an individual's attitudes, thinking, emotions or behaviour. The	Deputy Director, Rehabilitation Strategy and Interventions	Completed

			policy sets out our intention that all interventions are either approved via our internal subject matter experts or accredited via the Correctional Services Advice & Accreditation Panel (CSAAP) and the rehabilitation board. The principles underpinning approval or accreditation are the same and include the expectation that all interventions should have a clear commitment to learning and evaluation. Following introduction of the NFI, the Womens Group are completing a stocktake and triage of all prison-based interventions for women to ensure compliance with the new policy framework. Upon completion of the triage, subsequent NFI applications for all potentially suitable interventions will commence.	Deputy Director Women's Group Deputy Director Women's Group	May 2025 May 2026
4	Include domestic abuse and sex working in the available pathways within the women's CRS provision.	Partly Agreed	The recommendation is partly agreed. The intention of women's services contracts is that the whole service is delivered in a way which responds to Domestic Abuse, experience of sex-work and other trauma that women frequently experience and takes a holistic approach to seeing the impact of these experiences through all needs and pathways, rather than considering these aspects in isolation. For example, contract requirements regarding finance, benefit and needs reference the need to be aware of the financial impact of coercive control for women.		
			HMPPS will reiterate with regional contract management teams which interventions and activities that support the pathways. These will subsequently be communicated to prison staff.	SRO for Electronic Monitoring and Commissioned Rehabilitative Services	June 2024
			There is currently a Delius flag for victims of Domestic Abuse and modern-day slavery, this is not reflected presently in Refer and Monitor, however, there are plans to capture this information from Probation Practitioners at the point of referral.	Deputy Director Probation Digital	September 2024
			As an interim measure HMPPS will improve content design and guidance to ensure that probation staff are clearly advised of any information relating to domestic abuse in the additional information box on Refer and Monitor.	SRO for Electronic Monitoring and Commissioned Rehabilitative Services	July 2024

			The new assessment and planning service being designed under the Assessing Risks, Needs and Strengths Project (ARNS) will, as OASys does, capture information pertaining to domestic abuse and the subject/s of that risk, for example, intimate partner and /or family member/s along with the nature of the risk, for example, violence, emotional abuse, stalking etc. As the ARNS project progresses the dedicated women's pathway workstream will commence work to fully scope and explore the potential opportunities to capture vulnerabilities, trauma and other significant events. Sex work will be considered as an important component of this work and is very much in scope. Until this work is commenced later into the ARNS project, it cannot be confirmed what additional questions will be included and how any risks in relation to sex work specifically would be flagged.	Head of Strategy and Delivery - Assessing Risks, Needs and Strengths Project.	August 2026
	For prisons, His Majesty's	Prison and P	robation Service should:		
5	Simplify the CRS provision in prisons to ensure all staff and senior leaders have clarity on roles and responsibilities, enabling all women in prison (including recalled women and those being released at the end of their sentence) to access the good-quality face-to-face help that they need for successful resettlement.	Partly Agreed	The recommendation is partly agreed for commissioning reasons. HMPPS will reissue guidance via regional Contract Management teams to provide clarity on the roles and responsibilities of CRS and pre-release teams including contact details for each provider.	SRO for Electronic Monitoring and Commissioned Rehabilitative Services	June 2024
6	Provide prison leaders with data on the outcomes achieved by CRS providers. Prison leaders should be actively involved in holding CRS providers to account when they do not fulfil their contractual obligations.	Partly Agreed	The recommendation is partly agreed for commissioning reasons, HMPPS are actively working to improve connectivity and collaboration between prison establishments. Probation regions can provide prisons with the data via contract management teams who are responsible for the management of the contract. As part of this role, the expectation is to liaise and have regular meetings with key stakeholders (including prison leaders) to discuss the delivery of services and performance of the CRS Providers.		
			HMPPS will review what data prison leaders require from regional contract management teams. Work will commence with regional contract management teams to understand current governance processes, improve connectivity and collaboration with prison establishments and establish regular dialogue with prison leaders.	Deputy Director Women's Group	September 2024

7	Give women in prison access to regular good quality keywork that supports resettlement.	Agreed	For 2024/25, HMPPS has directed that every establishment's core aim should be to deliver a minimum of one key work session every four weeks to every eligible prisoner and this will be set out in the establishment's regime plan. However, an enhanced key work offer must be provided to individual prisoners based on assessment of risk, need and cohort prioritisation (such as early days of custody, remand, IPPs, young adults and learning difficulties). Additionally, prisoners who are new into custody (including those transferred new into an establishment) should receive a key work session within the first 14 days and prisoners should receive a key work session 14 days prior to release. This is a minimum and prisons should be aiming to increase their delivery during the year. All women's prisons will be expected to improve quality of key work as currently measured. HMPPS will have a specific focus upon HMP&YOI Low Newton where a model of quality improvement will be grown in 2024/25 which can be shared across the rest of the estate in 2025/26.	Deputy Director, Courts and Custody Group Deputy Director Women's Group	June 2024
8	Ensure data is available to track the accommodation status of all women released from a particular prison at 12 weeks after release, so that outcomes for each establishment can be monitored and improvements made where needed.	Not Agreed	HMPPS does collect data about the number of prisoners in accommodation of all types three months following release. This is collected via Probation Service Level (SL) measure SL15a, which measures the proportion of service users in settled accommodation at three months post release for custodial sentences. However, HMPPS does not consider this a useful measure to share with prisons, as there are many external variables which might affect an individual's accommodation status 12 weeks post-release. Providing this information to prisons would not provide any reliable indication as to the success of their engagement or resettlement planning with an individual before release. Rather, HMPPS will continue to consider the measure of accommodation on first night of release to help inform prison activity. As part of ongoing development of the performance measurement process, HMPPS will be introducing a further probation focussed measure recording settled accommodation status nine months after release from custody. Collaboration and connectivity will continue to be improved between prison and probation teams to allow any trends around resettlement to be discussed where required to support continual improvements in delivery.	HMPPS Analytical Services Deputy Director Women's Group Head of Policy MoJ Accommodation	

9	Ensure that, on the day of release from prison, the number of appointments women are expected to attend are realistic and they have access to sufficient practical help, including: a) a basic mobile phone if they do not have one. b) for women who are	Partly Agreed	The recommendation is partly agreed as HMPPS will not be issuing mobile phones, for affordability reasons (part a of the recommendation). Pre-release teams complete an identification of immediate resettlement needs assessment on all receptions into custody. This informs referrals to prison-based services or CRS services as appropriate. a) This part of the recommendation is not agreed for affordability reasons, the issue of mobile phones for prisoners on release was introduced during the pandemic to support remote interviewing. This initiative has now ended although some prisons may still be in the process of issuing the remaining stock. There are no plans to reintroduce this scheme at the current time.	Deputy Director, Courts and Custody Group Head of Resettlement Policy MoJ	Completed
	unlikely to cope on the day of release, someone to collect them at the gate and help them to attend appointments. c) a safe, supportive space on prison		b) Additional support can be accessed for those women that require it including being met at the gate via the social inclusion element of the CRS Provision. This can be requested via a referral made while women are in custody. Communications will be issued to ensure that Probation Officers and Key Workers understand the social inclusion pathway and what support is offered in relation to meeting prisoners at the gate and support with appointments. c) HMPPS recognise the value of having a dedicated physical space on day of	SRO for Electronic Monitoring and Commissioned Rehabilitative Services Deputy Director Women's	June 2024 March 2025
	premises, run by dedicated staff, where women who have been released can get help and plan for their onward journey.		release to support prison leavers with coordinating multiple appointments and accessing practical support. HMPPS will take this forward through work to scope and test Departure Lounges. These are being piloted in the North-East covering HMP Holme House, HMP Northumberland and HMP & YOI Low Newton (Women's Prison) which is being led by NEPACS, a charity working in the North-East of England to support prisoners and their families. The pilot will help to inform policy design and practice in relation to support on the day for those prison leavers with immediate needs.	Group	Watch 2023
10	Ensure that women's resettlement needs in prison are properly assessed in a timely way, and that any barriers, such as obtaining bank accounts or national insurance numbers, are overcome	Agreed	HMPPS has developed an action plan for its strategic approach to resettlement which sets out the clear steps HMPPS will take to ensure an improved, consistent approach to resettlement. This will ensure resources are targeted to best effect, with clear accountabilities so that outcomes can be improved for people, regardless of gender, leaving prison and returning to the community.	Deputy Director, Rehabilitation Strategy and Interventions	April 2025
	ahead of release.		Basic Custody Screening Tool (BCST) assessments are required to be completed for all receptions, including women on remand, within 72 hours. This is to allow time for those who go on to be sentenced to short prison sentences to prepare for release, sustaining existing services where possible.	Deputy Director, Courts and Custody Group	September 2024

Prison Pre-Release Teams are to complete BCST2 within five days of receiving the completed BCST1. Actions arising from the BCST 2 could include referring into prison-based services such as applying for ID, opening a bank account and obtaining NI numbers. In addition, pre-release teams should liaise with Community Offender Managers (COMs) to ensure they are aware of the work they need to do to prepare for the individual's release. Unless there are extenuating circumstances the expectation is that PRTs will now conduct interviews in person in a private space wherever possible. Whilst operational demands may impact upon this, as a minimum to support confidential conversations, women should be offered the option of a face-to-face interview at a later stage in a confidential setting. The Pre-Release guidance for Pre-Release teams will be updated by September 2024 to make this clearer. HQ functions and Area Executive Directors (AEDs) will continue to hold prisons and probation to account for delivery against these standards and will continue to monitor completions of both BCST1 and 2. HMPPS are introducing Prepare Someone for Release for both staff and prison leavers which will deliver on the Resettlement Passports ambition to bring together key information and services that an individual needs in one place to address their known drivers of repeat offending, ensuring a smoother transition into community. Both tools are currently in development, being tested in a live environment before being rolled out more broadly across the estate by the end of 2024. Prepare Someone for Release is the start of the replacement of BCST. Currently, the information needed to assess the suitability of a prisoner's release page at the service of the prisoner's release.	Deputy Director Prison Digital	December 2024
leavers which will deliver on the Resettlement Passports ambition to bring together key information and services that an individual needs in one place to address their known drivers of repeat offending, ensuring a smoother transition into community. Both tools are currently in development, being tested in a live environment before being rolled out more broadly across the estate by the end of 2024. Prepare Someone for Release is the start of the replacement of BCST.		December 2024

			resettlement activity; and empowering prison leavers to better engage with services.		
	For probation, His Majesty	's Prison and	Probation Service should:		-
11	Ensure that regional probation directors provide services for women in line with all aspects of the Women's Policy Framework, including: • making sure appropriate unpaid work placements are available for women in all probation delivery units. • giving all women the opportunity to report to appropriate locations where they feel safe, for all aspects of sentence delivery.	Agreed	The reviewed Women's Policy Framework will be published in the summer, it will reaffirm expectations of service delivery for women in custody and community settings as well as providing comprehensive operational guidance for practitioners and leaders around 'how' best to deliver. A Community Payback women's strategy is also being developed, which will set out the requirements and best practice for women, including the delivery of appropriate quality placements for women undertaking Community Payback.	Deputy Director Women's Group Deputy Director Sentence Management and Unpaid Work	September 2024 September 2024
12	Ensure that assessments accurately identify appropriate interventions for women, and that the delivery of all interventions is sufficiently monitored and analysed, including attrition rates and shortfalls against identified need.	Agreed	All accredited programmes are subject to monitoring and quality assurance in line with accreditation criteria. All non-accredited interventions, that aim to change an individual's attitudes, thinking and behaviour fall within the scope of the NFI. The framework sets out the minimum required standards for interventions, one of which is that all interventions should be delivered as intended and that there should be a process by which this is monitored, and quality assured. The Effective Proposal Framework (EPF) tool must be used in the preparation of all Pre-Sentence Reports where a proposal for a community-based penalty is being formulated, or when a woman is being released from custody to identify eligible licence conditions. The tool will support Practitioners to identify interventions that are available to women, and which are targeted at their gender-specific needs. The tool will also support data analysis to monitor proposal and planning behaviour when working with women, including providing management oversight of any decisions made within the EPF tool which do not	Deputy Director, Rehabilitation Strategy and Interventions Deputy Director, Courts and Custody Group	Completed

			align with the organisation's expectations around how interventions should be effectively targeted for women. The Assessing Risks, Needs and Strengths (ARNS) project will design an end state assessment and planning service that will support uptake in the volume of referrals to correctly targeted interventions for people on probation and in prison. Within the new service, practitioner prompts will be embedded which, will help signpost and recommend appropriate suggestions for interventions. This will also support practitioners in optimising sequencing of intervention activities according to prioritisation of risk and needs.	Head of Strategy and Delivery - Assessing Risks, Needs and Strengths Project.	August 2026
13	Review the governance and resourcing model for women's approved premises to ensure that the complexity of working with women and their differing level of need is fully recognised.	Agreed	 HMPPS Community Accommodation Service will build on the positive joint work being done with the Women's group to review the approach to women's Approved Premises (AP), this will include. A review of the staffing model for women's AP. A training needs analysis of staff working in women's AP. The need for a bespoke approach to referrals to be considered. Further work to increase the numbers of women who can access an AP place as a requirement of a community order. 	Probation Director - Community Accommodation Services	March 2025
14	Ensure probation court report writers are up to date and aware of all services and interventions for women and therefore equipped to provide comprehensive gender-informed sentencing recommendations.	Agreed	The EPF1 tool must be used in all cases where a Pre-Sentence Report (PSR) is being prepared. This includes all Report types (Standard, Short Format and Oral Delivery Reports). The only exceptions are if the person being assessed is living outside of England or Wales, they are being sentenced under pre-ORA (2015) legislation or an immediate custodial sentence of four years or more is inevitable. Use of the EPF tool will support PSR authors to identify all eligible interventions and services available to women, based on their risk and need profile. Whilst the selections made in EPF will be based on the professional judgement of the PSR author, use of the tool ensures that proposals are gender-informed and aligned with policy, sentencing guidelines and the evidence base for the effective targeting of interventions for women. Guidance is also available on EQUIP, the Aide Memoire for Court Reports on Women. This was formally refreshed and relaunched in July 2023 and has since been regularly promoted and highly accessed – having been downloaded on EQUIP over 900 times since relaunch.	Deputy Director, Courts and Custody Group Deputy Director Sentence Management and Unpaid Work Deputy Director Women's Group	Completed

Recommendations	
Agreed	7
Partly Agreed	6
Not Agreed	1
Total	14