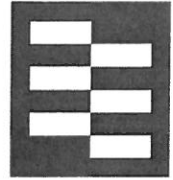**HM Prison &
Probation Service**

**National
Probation
Service**

NAPO feedback on NPS Phase 2 Blueprint

Thank you for your letter of 3rd April 2017 outlining your response to the formal consultation on the E3 Phase 2 Blueprint.

We have considered this in conjunction with all the other feedback we have received. The consultation has been useful in drawing our attention to some elements which require further clarification.

Please note we are not able to comment on the specific proposals for the new Offender Management Model as this is separate from E3 and will be consulted separately. However, we note and appreciate your wish to be change champions.

We will respond to your comments on each chapter.

Chapter 1- MAPPA
We note that the proposals to harmonise Job Descriptions are likely to have an impact on members and we would welcome the opportunity to work with the employers on this using the agreed process, to be able to consult on proposed Job Descriptions prior to Job Evaluation and to work on collective appeals should they be warranted.

There is a potential proposal to review resourcing for MAPPA following the issuing of new job descriptions. It is not made clear what the implications for NPS members are from this and we would welcome the opportunity to consult members on any proposals that may have an impact on their work.

Any change to job descriptions will be subject to the usual consultation process at national and local level. This applies both to the current harmonisation proposals and any future proposals which may affect staff. Current MAPPA staff have been fully engaged in the development of these job descriptions through a number of workshops across England and Wales.

We are not currently reviewing MAPPA resourcing, but will of course consult our Trade Union colleagues if/when this takes place.

Chapter 2 – ViSOR
There are a number of implications of the extended use of ViSOR and we will deal with the professional and practice aspects separately to the impact on members employment.

Professional and Practice issues
Workload implications – the blueprint suggests that all MAPPA eligible cases (thought to be 80-90% of total caseload) will require the Officer to use ViSOR in addition to the existing case recording and assessment tools. This means that in addition to recording information on nDelius it will have to be duplicated onto ViSOR and ViSOR will have to be checked in addition to nDelius for updates. In addition to the preparation of ARMS assessments by downloading the form from nDelius and then uploading the completed version back to nDelius the form will also need to be added to ViSOR. It is likely that information added to OASys will also need to be duplicated. In an environment where members are already struggling with the added work required to complete an ARMS assessment which is not adequately recognised in workload timings it is not clear where the extra time will be accounted for. One of the most frequent complaints about Probation systems is the duplication of data inputting, on OASys and nDelius, forms which do not auto-fill basic details, endless copying and pasting from various documents and forms to others. Adding to this burden is likely to have a significant impact on the ability of staff to carry out quality and detailed work.

Our view is that the information sharing made possible by increased use of ViSOR will assist staff in producing quality and detailed work. We are aware that there are concerns about possible workload implications associated with ViSOR use. These will need to be taken into account in assessing staff workloads, and there will be further consultation with the trades unions on this. We envisage that as staff become more proficient in ViSOR use, the impact on their workload will reduce. For now ViSOR admin will input the majority of data. In the future it is anticipated that OMs will also be able to copy and paste their nDelius entries into ViSOR at the same time as they populate nDelius.

As completing and uploading ARMS assessments will now be the responsibility of NPS staff, the workload management tool has been adjusted to take account of this change. Current WMT allowance for ARMS is 4 hours for CO/SSO cases and 2 hours for licence cases. The allowance is only given once at the beginning of the order, .i.e. for the initial assessment. There are no allowances given for ARMS updates.

Current ViSOR computers have significant access restrictions such as being in a separate room not visible from the door or windows and it is not clear from the blueprint how this will work when every computer in an open plan office becomes a ViSOR machine?

It is envisaged that the access restrictions associated with ViSOR will be less onerous as the new IT equipment arrives and operational staff are using it routinely. However, the security

requirements will not change, and staff should ensure that screens are not visible from outside the room nor to anyone visiting the building.

The original roll out of ViSOR use was problematic and the training was in the form of briefings for most staff. This did not adequately prepare many staff for using an unfamiliar system which has very rigid rules for recording and using information which are very different to what most employed in the NPS are used to. Training will be required to enable staff to understand the system and how they will be expected to use it.

We agree, a training package is currently in development. This will be linked to the rollout of the new IT equipment, and will be user training, not a briefing.

Employment issues
The original introduction of ViSOR use will be remembered by many in Probation as a difficult time. Following extended discussions many former Probation Trusts operated an opt-in system to deal with concerns around the extended vetting required and the potential implications of vetting outcomes. In practice we understand that staff may fail vetting for reasons that may appear to be relatively mundane and would not necessarily mean their employment was under threat. The Police Service carrying out the vetting were not always able to disclose details of vetting failures and that left the employers in a difficult position. We welcome the reassurance from the centre that staff who do not pass the vetting will be redeployed into other roles but we have reservations about this and how it will be done. It is not clear what other roles exist and how people affected will access them. Additionally we have already been contacted by Reps in one Division where the Deputy Director suggested at a JCC meeting that there is an expectation that staff will pass vetting and be of good character otherwise there would be a conduct issue. If this is the reality of the situation in the divisions the reassurances from the centre will need to be reinforced through the management structures to prevent difficulties in implementation.

It is not our intention to create anxiety and distress among staff. However, we understand that the prospect of additional vetting is not welcomed by everyone. A position where some of our staff are managing high risk offenders without quick and easy access to a key information sharing tool is not sustainable into the future. If staff have anxieties, such as the sharing of information about themselves or family members which they believe may be detrimental to their vetting process, the best advice is to speak to the line manager. Most vetting issues are caused by non-disclosure of relevant information, rather than by the nature of the information itself. We are working closely with police colleagues to establish processes which involve dialogue where there is an issue with an individual's vetting, and a clear process for appeal where our view is that the decision is incorrect. There may be a very small number of staff who do not meet the vetting and every effort will be made to find them a location and role which suits their experience and skills in line with NPS and civil service redeployment processes. If any significant issues are identified they will be dealt with on a case by case basis according to a national process currently in development.

Experience of 1:1 meetings during E3 phase 1 has been very varied with some staff who are significantly affected by the processes having no or little contact with anyone who can answer

their concerns and refusals to re-run 1:1 meetings where circumstances change. It is vital that NPS get this right during this delicate process and we would welcome the opportunity to discuss the concerns and work with the employers to produce guidance for line managers and decision makers for these processes.

Thank you for raising this important issue. Line managers were requested to hold 1:1 meetings with all their staff to discuss how staff would be impacted, what their options were, what their development needs might be, whether there are any specific issues that the employee would want considered during the change process. The 1:1 meeting was regarded as an opportunity for a member of staff to have a discussion with their line manager regarding their personal situation in relation to E3 implementation. If staff wished to have a further meeting as they were not certain about the available options this was encouraged whilst 1:1s were continuing but there had to be a cut-off point where this would no longer be possible. Members of staff were advised that they could seek advice from a trade union member following the meeting but we would welcome further discussion with you regarding this matter to ensure that problems are addressed.

We welcome the assurance given verbally that ViSOR is AT compliant but we hope that the employers understand our reservation in accepting this assurance. Our members have faced an endless stream of IT launches that we are assured are compatible with the most common AT systems but this rarely translates into reality. We would like an assurance that ViSOR use will not be extended until it can be reported to the NPS AT user group that real Probation AT end users have successfully tested it using real life work product.

As part of the preparation for the roll out of new computers by the TTP programme, all applications in use by the NPS are being tested for AT compliance. AT users will be involved in this. We are not planning to extend the use of ViSOR more widely until TTP is rolled out.'

We note that the ViSOR administration roles will be carried out by staff working to generic Case Administrator Job Descriptions. It is not clear if the new responsibilities of "Local Point of Contact" and "ViSOR Administration" functions are covered in the Case Administrator Job Description and in the JDQ which was evaluated in the original Job Evaluation. If these functions were not covered we request a new job evaluation process for this role in line with other roles that change due to E3.

We have reviewed the role of the visor administrator against the case administrator job description. Our view is that visor administrator tasks, including being a local point of contact, are covered by the responsibilities listed, and that therefore no new job description is required.

Chapter 3 – Sex Offender Interventions
New Accredited Programmes - There is little detail about the new programmes which will be rolled out and it is not clear how these will fit with current demand and resourcing.
As stated in the blueprint, these programmes are based on the most recent evidence of what works with people who have committed sexual offences. Horizon has already commenced rollout and Kaizen has received accreditation. The resource model for the programmes is based on the projected demand for the programmes and the activities involved in delivering them. .

Programme and Treatment Manager Role – in the past the treatment management function was performed outside of the line management function for some sound reasons, not least because some programme manuals required it.

Interventions Services are represented on the work package which developed these proposals, and are content that this proposal does not conflict with programme requirements now or in the future.

Lack of detail about the new programmes means we cannot comment on this but the principle of quality development being separate from line management is replicated in Offender Management by the existence of QA and QDO roles in addition to line management structures.

The QDO role does not replace a line manager's responsibility for the professional development or quality assurance of the work of the staff under their remit; the role is intended to complement the line manager role. We therefore do not agree that this proposal conflicts with already agreed and implemented model changes.

It is not clear what the ratio of staff to Line Manager will be however the additional work of treatment and programme management as well as line management suggests that the ratio should be less than the 1:10 in the rest of the NPS.

We agree that combining treatment management with programme management will make more demands on the manager's time. We used the resourcing model for the new programmes to ascribe timings to the treatment manager element of the role and then included in timings for the programmed manager elements, this means that the ratio is less than 1:10 in total for the combined role. The treatment manager timings are based on the number of programmes delivered.

We wonder if there will be a new Job Description for the new role and if so our expectation would be that this would be subject to job evaluation.

This is not a new role, but a combination of two existing roles. We have reviewed the roles and responsibilities against the existing SPO job description and they are consistent with this. Therefore there will be no new job description for this role.

Programme Facilitator Role – moving people out of this role after 5 years may promote flexibility but we question the impact on existing staff who may have been in post for a significant length of time with no expectation of moving to a different PO role. This needs to be managed carefully and there may be pragmatic decisions to make to ensure stability for the teams and sensible outcomes for example where staff are nearing the end of their career.

We agree. The proposal is that consideration be given after 5 years and not that staff are moved out irrespective of circumstances – all staff changes will need to be made in line with business needs and taking account of staffing needs.

PSO Programme Facilitators – the blueprint is confusing on this matter as the information in section 3.5 initially states that "staff currently in facilitator posts who do not have a PO qualification but who are otherwise appropriately qualified to deliver programmes may remain in post". It later states that "Those staff who do not hold the necessary PO qualification, not the VQ4 level qualification noted above, will be unable to continue in a role which requires it". It is not clear what the VQ4 qualification being referred to is, the first statement suggests that

anyone qualified to deliver the programmes will remain in post and we understand this to mean those who have secured appropriate accreditation to deliver the programmes. No one has been able to explain what VQ4 qualification is although one divisional senior manager suggested it could be any VQ4 or equivalent qualification. There are likely to be differing numbers of facilitators who do not have a PO qualification around the NPS and we would ask that sensible and pragmatic decisions are made about redeployment of staff especially where the facilitators are fully accredited and have a high level of skill and experience to offer teams which will be in transition.

The work package agreed that anyone currently operating in the Facilitator role who is not PO qualified could stay in post on a protected basis under the usual HR terms if they hold a relevant VQ4 qualification. Anyone who does not hold at least a relevant VQ4 qualification would be moved to an alternative PSO role within their division. The timescale for these changes will vary as each division will implement the new model at a pace which meets local needs. Standard HR processes will apply for all staff affected.

Where there are non-PO qualified facilitators it is not clear if the expectation to move on after five years will apply to them. If this is the case we would welcome further guidance around relevant roles and processes for redeployment and we would expect that these staff would continue to be protected from redundancy under the E3 agreement even after five years.

You are quite right that the E3 commitment to no redundancies will apply. However, pay protection for non-PO qualified staff will be for 3 years as per the usual HR process as agreed with the recognized Trade Unions. The programme has agreed that anyone currently operating in the Facilitator role who is not PO qualified could stay in post on a protected basis under the usual HR terms if they hold a VQ4 qualification. Anyone who does not hold at least a VQ4 qualification would be moved to an alternative PSO role within their division. The timescale for these changes will vary as each division will implement the new model at a pace which meets local needs. Standard HR processes will apply for all staff affected.

The E3 commitment to no redundancies will apply. Pay protection for non-PO qualified staff will be for 3 years as per the usual HR process.

Chapter 4 – Administration
We welcome the decision to use ratios of 1:4 for OM teams and 1:3 for Courts. The question many members have asked is whether this will apply to those OM teams based in custody as the administrative workload will move with the cases and OMs. We have a concern about the development of administrative hubs and would seek an assurance that any plans to develop these in the divisions will be subject to proper consultation with Trade Unions at a divisional level. We note that there is a potential for disproportionate impact on staff if some divisions introduce administration hubs which require relocation of staff and others do not and this means that consultation on any plans is even more important.

We appreciate your positive comments about the ratios, and note your concerns about differential implementation of hubs. However, decisions about moving to this model will be made in divisions and consulted locally.

Chapter 5 – Complaints
We welcome the development of a standard approach to complaints management and we look forward to the continuing positive approach to learning lessons rather than apportioning blame

when things go wrong. The model specifies that the complaints investigators will be SPOs working to the generic SPO job description. We would suggest that any team is made up of SPOs with a variety of recent management experience ensuring that there is a variety of skills and experience available especially where the complaint is complex.

We are grateful for your positive comments on the complaints proposals, and note your suggestion for implementation.

Chapter 6 – Job Role Harmonisation

Polygraph Examiners – It is not clear from the blueprint if a new Job Description is being developed for this role and some clarification on that would be helpful. Aligning the work of the Polygraph Examiners with sex offender interventions appears to be unproblematic except for the obvious tensions alluded to when the strategic lead is national and the resource is essentially national (although notionally allocated to a division) but the line management is more local. We would welcome more detail on this and the chance to review arrangements post-implementation.

No new job description is being developed, it is simply standardizing line management arrangements which are already operated within the divisions, so that these are aligned with the new divisional units. The role is otherwise unchanged. The divisional management of this resource makes sense as it is a national service delivered on a divisional basis.

Housing/Accommodation Workers – The transfer of staff who currently work as specialists to a generic PSO role may be welcomed by some however some members have concerns about both the process and outcomes of this move. Staff who were originally recruited to a specialist role may have development needs in relation to moving to a PSO role in addition to process based training. The offer of training is always welcome however this needs, where required, to include an opportunity to develop broader skills rather than knowledge of processes and data input requirements. Moving from working with a certain client group in a supporting role to a supervising and enforcement role can be a difficult transition and we would welcome further discussions about managing this process.

We agree that any staff moving from a specialist to a more generic role will need additional training. This will be designed on an individual basis owing to the relatively small numbers of staff affected.