



Her Majesty's
Inspectorate of
Probation

Consultation on the future of adult inspections

July 2020

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Foreword

The government has announced changes to the way that probation services will be delivered from June 2021. HM Inspectorate of Probation must bring its inspection regime in line with the new delivery model for probation so that we can continue to drive improvements in probation services. We have worked closely with the HMPPS probation transformation team and the National Probation Service (NPS) in England and Wales in developing our proposed approach. Thank you to all of those involved.

The new probation delivery model puts responsibility for probation provision into one NPS supported by a dynamic framework of commissioned specialist services. We want to make sure that our proposed approach remains focused on the things that make a difference to the quality of probation services and we want to continue to uphold the key principles of inspection agreed by all the criminal justice inspectorates. These include a focus on improvement and outcomes, an inspection methodology and frequency that is proportionate to risk, and including a user perspective in our approach.

In this consultation we are asking for your views on how we reconfigure our standards and how we deliver, rate and report on our inspections of probation services to reflect the new landscape from next year. We are currently considering the appropriate timeframe for starting our new inspection framework and will include more details on this in our second consultation in early 2021.

The proposed changes will enable our inspection regime to best fit the new delivery model for probation. In making the changes we will continue to provide a proportionate approach to inspection, working with those who deliver services to drive improvement and identify effective practice.

This is the first of two consultations. This consultation focusses on our broad approach and closes on 30 August 00.00. It will be followed in early 2021 by a further consultation on the detail of what we develop. We would like to hear your views on our proposed broad approach, and I hope you will take the opportunity to respond.



Justin Russell

Chief Inspector of Probation

1. Background

- 1.1 Under the new probation delivery model set out by the Ministry of Justice, responsibility for the provision of probation services will move to the NPS. The service will be split into 12 regions across England and Wales. Each NPS area will be overseen by a regional probation director who will have responsibility for the delivery of probation services in their region. NPS operational delivery in each region will be reorganised around Probation Delivery Units (PDUs), led by a manager with between five and 18 of these PDUs in each region. With the ending of the split between NPS and CRC services, HM Inspectorate of Probation will cease to focus on different providers of services. Instead, we will inspect the new arrangements based on overall provision to individual service users.
- 1.2 HM Inspectorate of Probation focuses on how **inputs and activities** deliver improved outputs and, in turn, better outcomes for service users and victims. Probation services are less likely to meet their aims without good quality inputs (such as professional staff and comprehensive services) and activities (such as case assessment and effective interventions). This will be as important as ever in the new delivery environment and we will continue with this approach. In addition, we want to say as much as we can about outcomes for service users in any local area. Although reoffending rates remain the main strategic **outcome** measure for probation services, we are considering how we can include early outcomes in our inspection of cases, for example in relation to accommodation, employment or substance abuse, against a new evaluation standard. We will consult on this in more detail in early 2021.
- 1.3 Our standards are ordered into three 'domains', with domain one relating to the way organisations are led and managed, and two further domains relating to the quality of work produced by the organisation, which we inspect through a detailed analysis of individual cases. Offender management, currently delivered by both the NPS and CRCs, is covered in domain two of our standards. Other areas of responsibility, specific to different types of provider, such as unpaid work delivery or the production of court reports are covered by our domain three standards.
- 1.4 Our inspections draw on a wide range of evidence including interviews and focus groups with staff and managers at all levels of each service from Probation Services Officers (PSOs) up to Chief Executives as well as undertaking detailed scrutiny of management data and individual case files. Our judgements on the ratings for the quality of offender management are quantitative ones driven by the aggregate results from our individual case inspections. Overall ratings on leadership and organisational delivery are qualitative ones made by our lead inspectors based on both the individual case assessments and evidence from interviews with staff, managers and external stakeholders. Full details of our methodology can be found at www.justiceinspectorates.gov.uk/hmiprobation/about-our-work/our-standards-and-ratings.
- 1.5 We have considered the timing of our inspections under the new delivery model. We want to achieve more granularity in our findings by inspecting a cohort of cases from every PDU in each region and have amended our timeframe to accommodate this approach. We propose to inspect all PDUs every two years. This will be accompanied by a regional inspection of those functions delivered or commissioned at a regional level and of the overall quality of leadership and support given to PDUs by the

regional directors and their senior teams. We propose to use regional rather than PDU level ratings based on aggregate data for the quality of unpaid work, statutory victim work and Resettlement provision across each region.

2. Our guiding principles

- 2.1 Our proposed approach is informed by the general principles of criminal justice inspection, to which HM Inspectorate of Probation is a signatory, which can be found at: www.justiceinspectorates.gov.uk/cjji/inspections/cjji-business-plan-2019-21.

It is also guided by the following principles:

- we will be robust, fair, transparent, proportionate, flexible and reliable
 - our impact should be both to inform practice and influence national policy
 - the quality of frontline service delivery is paramount but is not a standalone measure of an effective service. We will continue to assess how providers are set up, led and managed
 - it is not our role to only quality assure lots of cases. We deliver inspection not audit and this requires us to provide as full a picture of delivery as possible, triangulated across domains. We should not duplicate the work of other departments
 - we will inspect the totality of provision, rather than inspecting by individual providers.
- 2.2 We want to give a stronger voice to those who are supervised by the services we inspect. A fundamental part of our assessment of the quality of services involves judging providers on how well they consult and engage with service users on the configuration of services. We want to hear from service users about what works for them and for them to be active participants in their own development and recovery, not just passive recipients of services designed for them. We have published a service user engagement strategy for the Inspectorate: www.justiceinspectorates.gov.uk/hmiprobation/about-hmi-probation/service-user-engagement-strategy and we will set out in more detail how we will expand the service user input into our future inspections in our second consultation in early 2021.

3. What is changing

- 3.1 This consultation covers three areas of proposed change: to the standards framework, to the way in which we inspect against those standards and to the timescales for our inspection programme. The proposed changes are set out below.

What should be the geographic unit of inspection?

- 3.2 We need to ensure our inspections are conducted at the right level and frequency to drive improvements. We currently inspect seven NPS divisions and 18 CRCs over an 18-month period. Inspecting in this way has enabled us to rate these units of inspection with findings triangulated across domains.
- 3.3 However, each of these areas may cover many different local service delivery units. The current NPS South East and Eastern division, for example, includes 10 different Local Delivery Units and covers a large geographic area stretching from Norfolk and Suffolk in the East, to Northamptonshire in the West and Sussex in the South. Our judgement on the quality of offender management in this region is an aggregated one, which may involve only a handful of cases from some Local Delivery Units and can hide very significant variation in the quality of supervision between different local areas, which can be more important than the overall average in understanding performance.
- 3.4 These large reporting areas can also make it difficult for regional directors to understand where they need to focus their attention and can be difficult for the public to relate to. For example, at present we are not able to tell residents in Leeds or Bristol or Newcastle or Birmingham how their local probation service is performing, because these inspection results are swallowed up in the inspection reports we publish for the much larger regions like the North East, South West or West Midlands. The 'reunification' of probation provision in each area under a single provider, gives us the opportunity to provide inspection results at these more local, useful and relatable areas.
- 3.5 The new NPS model divides delivery into 12 regions across England and Wales from June 2021. Each region will be sub-divided into 108 smaller PDUs, most of which will be aligned to local authority areas. There will be a regional probation director for each region and a manager for each PDU with responsibility for frontline delivery and for building strong local partnerships with the police, local prison governors and local authorities. We want to inspect and rate the provision of services at a local PDU level as well as making judgements about how well a region is operating. This will enable regional directors, local stakeholders and the public to understand how services are performing in their local area as well as judging how effectively regions are supporting that frontline delivery.
- 3.6 To achieve this, we propose to inspect all PDUs in a region consecutively with a regional inspection at the end of the group of PDU inspections. The PDU findings from within each region will inform the regional inspection.

QUESTION – Is an inspection focus on the new local PDUs the right approach?

- 3.7 We propose to split our qualitative standards on organisational leadership and delivery (domain one), so that some will be inspected at a regional level, some at a PDU level and some at both. This means there will be two parts to our domain one

standards, each inspected at separate levels but triangulated across the region for our overall regional ratings of the quality of leadership, staffing, services and facilities. Those judged at PDU level will also inform regional domain one judgements. For example, we will ask local heads of PDU and their staff for their views on the quality of support they get from regional directors and their senior teams in relation to their staffing requirements or the range of services they are able to offer. Inspections of individual cases and the quality of individual offender supervision (our domain two standards) will be conducted at PDU level only.

- 3.8 The HMPPS target operating model for the delivery of probation services outlines some of the accountabilities to be held at a regional and at a PDU level. There will be a regional infrastructure reporting to the regional probation director. Heads of PDUs will be responsible for frontline delivery to service users. We want to drive improvement and make recommendations underpinned by our findings at the right level. We propose to rate the quality of offender management of a sample of cases (our domain two standards) at a PDU level and publish a short report for each PDU within a few weeks of the PDU inspection. This report will include domain two findings and ratings and will comment on relevant PDU domain one standards, such as adequacy of local staffing and staff engagement and the quality of local management supervision of responsible officers. We are considering whether we should also rate PDUs against the relevant domain one standards.

QUESTION – What information would be relevant and useful to publish at a PDU level?

QUESTION – Should we include ratings for local leadership, staffing and services as well as ratings of the quality of individual case supervision?

Sampling of cases for inspection

- 3.9 If we move to inspect cases in all PDUs, it is difficult to sample the right types of cases in sufficient numbers. We want to be able to comment with sufficient confidence on cases at this lower level.
- 3.10 Instead of taking a sampling approach, we propose to inspect all eligible cases in each PDU which commenced over a given one to two-week period. This negates any need for sampling and removes any concerns about sufficient confidence levels and margins of error. If a PDU advises that something particularly odd happened in one week (for example, a court had to close or IT system went down) then we could shift our requested date parameters by a week. The number of cases inspected under this approach in each PDU will reflect the volume of new cases coming into each team during a one or two-week period and is likely to range from 20 to 30 in smaller areas to more than 100 in the largest ones like Birmingham and Solihull.

QUESTION – Do you see any problem with us moving from a sampling to a cohort approach to domain two inspection?

Regional level inspections

- 3.11 Regional inspections will take place once all the PDU inspections for that region have been completed and will draw on the evidence from those inspections. Based on that data and on the evidence gathered from region-wide management information and interviews and focus groups conducted with the regional director, their senior teams and other regional level stakeholders, we will assign overall

ratings for our domain one standards relating to leadership, staffing, service provision and quality of facilities and ICT across the region. We can also include aggregated data from our PDU level inspections to rate the quality of unpaid work and resettlement services at a regional level.

- 3.12 Given that victim liaison services are likely to be organised and delivered across a region or sub-region, rather than at individual PDU level, we will draw a sample of victim contact scheme cases from across each region to reach a regional level rating for the quality of these services.

QUESTION – What aspects of probation organisation and delivery should be inspected and rated at regional rather than PDU level?

QUESTION – Should unpaid work, resettlement services and the quality of victim liaison work be rated at regional rather than PDU level?

Regional versus national accountability

- 3.13 Our first round of NPS inspections against our new set of standards (2018 to 2019) found some areas of good performance but also significant concerns in many areas. This was particularly in relation to staff recruitment and the quality of accommodation and facilities management – with a majority of services rated as ‘Requires improvement’ against these standards.

- 3.14 Whilst NPS divisional directors recognised the problems we identified, they told us that in practice they often had little control over staff recruitment and training or facilities management as both were managed nationally by HMPPS headquarters. A subsequent inspection of the quality of HMPPS headquarters support to regions, confirmed that there were significant national issues with probation officer recruitment and the performance of national facilities management contracts, and that accountability for both aspects of service delivery clearly sat with the relevant central HMPPS teams rather than with regional directors.¹ Although regional directors may have more autonomy in the new structures, it is likely that accountability for some services will still sit elsewhere. Some aspects of probation delivery, such as the management of approved premises have also been made national rather than regional functions.

QUESTION – Responsibility for some aspects of probation delivery will continue to rest at national rather than regional or PDU level. How should inspection of these functions be taken forward from 2021?

Frequency of inspection

- 3.15 We currently inspect all providers across a 12 to 18-month period. This was necessary at a time of significant concern about the implementation of the *Transforming Rehabilitation* reforms, but has not allowed much time between inspections for recommendations to be acted on. Inspections were perhaps too frequent for high-performing services.
- 3.16 We want to take a proportionate approach to inspection and allow for sufficient time between inspections for improvements to be made. We propose to inspect each PDU and each region every two years.

¹ HM Inspectorate of Probation. (2020). An inspection of central functions supporting the National Probation Service.

- 3.17 With this approach we will inspect all PDUs in a region as a group with each PDU inspection lasting for one week. This means that some regions will have more than one PDU inspection at one time. The regional inspection will be undertaken once all the PDU inspections for that region are completed and we expect to inspect six different regions each year.
- 3.18 We considered moving to a three-year programme of inspection and have discounted this approach. We consider this to be too infrequent, requiring an additional system of monitoring in between inspections for regions and PDUs rated as 'Inadequate' or 'Requires improvement'.

QUESTION – Is inspection of each PDU and region every two years a proportionate approach?

Inspection standards

- 3.19 Our current probation inspection programme focusses on the different services delivered by different types of provider rather than on the way these all come together in the end-to-end provision for individual service users. This was introduced to highlight performance issues in key areas of delivery, such as unpaid work and to drive improvement at a time when probation services were delivered under a mixed model by public and private sector providers.
- 3.20 Inspecting in this way once the NPS/CRC provider split no longer exists does not make as much sense. Instead, we think that inspecting how each aspect of delivery comes together in end-to-end provision for individuals under supervision is the best way to capture the delivery and impact of probation services for those who experience them. The new approach to delivering probation services aims to address some of the separation created by *Transforming Rehabilitation* and inspecting provision rather than providers will be a better fit under the new arrangements.
- 3.21 In practice this means that we propose to remove the provider specific third domain from our standards. This domain is modular and sector specific and currently includes standards on court work and allocations and statutory victim work for the NPS and Through the Gate and unpaid work for the CRCs.

We propose that the quality of court work, unpaid work delivery and resettlement services will now be inspected as part of our overall approach to inspecting individual cases supervised by the service. So, having selected between a one and two-week cohort of cases at PDU level we will then look at every aspect of each of those cases. This will include:

- the quality of the court report produced by the relevant NPS court team before sentence and whether the case was allocated to an appropriately experienced and trained responsible officer
- for cases being supervised on licence, the work that was done in prison to prepare the service user for release and how the transition back into the community was managed
- the quality of assessment and sentence planning undertaken – both with respect to rehabilitative needs and management of potential risks to the public
- the quality of delivery of any sentence requirements – including unpaid work and any specified accredited programmes or treatment requirements – as well

as other rehabilitative services or offending behaviour interventions identified at the assessment and planning stage

- the quality of reviewing undertaken to assess progress against sentence or release plans and whether appropriate changes were made to these plans to reflect changing circumstances or risks.

3.22 We propose to inspect statutory victim work at a regional level only. At a local level in any inspection sample period, there are likely to be very low numbers of custodial sentences commencing and/or cases being released from custody, where a victim is eligible for statutory victim contact. It would be difficult to rate this work at a PDU level, based on very small numbers of cases. In addition, we understand that in many areas, victim teams are organised across broader areas than a single PDU. Inspecting at a regional level will ensure numbers of cases are sufficient to form a basis for judgement and rating, and will not be complicated by potentially different accountability arrangements for delivery of that service.

Evaluating outcomes for service users

3.23 Our current inspection standards focus on inputs and processes rather than the outcomes of supervision for individual service users. The standards are based on the LOGIC model where good quality inputs and well managed supervision will deliver better outcomes for service users. We do not inspect outcomes per se and recognise this as a significant gap which may be of most interest to the public.

3.24 We want to identify where early outcomes for service users have been achieved. We propose the addition of an evaluation standard to our domain two standards. This standard will focus on the progress that each service user makes towards desired outcomes while under probation supervision. It will look at evidence of sustainable progress on key measures like accommodation, employment, drug or alcohol use. We know these factors are linked to reoffending rates in the longer term, as well as to the potential risks that service users pose to their families or the wider public, and to their ongoing involvement in crime.

3.25 Linking the structure, format and content of this standard to our existing domain two standards around the quality of assessment, planning and service delivery should enable us to fully inspect the causal link between the quality of these processes and outcomes for those under supervision. This is shown as part of the existing domain two standards in Annexe A. Application of the standard will be tailored to the individual service user, for example by considering their specific risks and needs, and the inclusion of both hard measures (for example, if they have a job and stable accommodation; if they are still testing positive for drugs) to more qualitative measures will help to provide the most complete picture.

QUESTION – What is the best way of measuring outcomes for service users while under probation supervision? What outcomes should we focus on?

4. How to respond

The deadline for responses is 30 August 2020 00.00.

Please email responses to consultations@hmiprobation.gov.uk.

As part of your response, please ensure that:

- you state clearly who the submission is from, for example, from an individual in a personal capacity or sent on behalf of an organisation
- you include a brief description of yourself/your organisation
- you state clearly if you wish your submission to be confidential and/or you do not want to be contacted with follow-up enquiries (see confidentiality statement below).

Confidentiality statement

The information you send HM Inspectorate of Probation may be published in full or in a summary of responses. All information in responses, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004).

If you want your response to remain confidential, you should explain why confidentiality is necessary and your request will be acceded to only if it is appropriate in the circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding.

Annexe A – Domain two standards

Domain 2		Key questions		
Standards		Engagement	Desistance	Public protection
Assessment	Assessment is well-informed, analytical and personalised, actively involving the service user.	<p>Does assessment focus sufficiently on engaging the service user?</p> <p>a) Does assessment analyse the service user’s motivation and readiness to engage and comply with the sentence?</p> <p>b) Does assessment analyse the service user’s diversity and personal circumstances, and consider the impact these have on their ability to comply and engage with service delivery?</p> <p>c) Is the service user meaningfully involved in their assessment, and are their views taken into account?</p>	<p>Does assessment focus sufficiently on the factors linked to offending and desistance?</p> <p>a) Does assessment identify and analyse offending-related factors?</p> <p>b) Does assessment identify the service user’s strengths and protective factors?</p> <p>c) Does assessment draw sufficiently on available sources of information?</p>	<p>Does assessment focus sufficiently on keeping other people safe?</p> <p>a) Does assessment clearly identify and analyse any risk of harm to others, including identifying who is at risk and the nature of that risk?</p> <p>b) Does assessment analyse any specific concerns and risks related to actual and potential victims?</p> <p>c) Does assessment draw sufficiently on available sources of information, including past behaviour and convictions, and involve other agencies where appropriate?</p>
Planning	Planning is well-informed, holistic and personalised, actively involving the service user.	<p>Does planning focus sufficiently on engaging the service user?</p> <p>a) Is the service user meaningfully involved in planning, and are their views taken into account?</p> <p>b) Does planning take sufficient account of the service user’s diversity and personal circumstances which may affect engagement and compliance?</p> <p>c) Does planning take sufficient account of the service user’s readiness and motivation to change which may affect engagement and compliance?</p>	<p>Does planning focus sufficiently on reducing reoffending and supporting the service user’s desistance?</p> <p>a) Does planning sufficiently reflect offending-related factors and prioritise those which are most critical?</p> <p>b) Does planning build on the service user’s strengths and protective factors, utilising potential sources of support?</p>	<p>Does planning focus sufficiently on keeping other people safe?</p> <p>a) Does planning sufficiently address risk of harm factors and prioritise those which are most critical?</p> <p>b) Does planning set out the necessary constructive and/or restrictive interventions to manage the risk of harm?</p> <p>c) Does planning make appropriate links to the work of other agencies involved with the service user and any multi-agency plans?</p>

		<p>d) Does planning set out how all the requirements of the sentence or licence/post-sentence supervision will be delivered within the available timescales</p> <p>e) Does planning set a level, pattern and type of contact sufficient to engage the service user and to support the effectiveness of specific interventions?</p>	<p>c) Does planning set out the services most likely to reduce reoffending and support desistance?</p>	<p>d) Does planning set out necessary and effective contingency arrangements to manage those risks that have been identified?</p>
Implementation and delivery	High-quality, well-focused, personalised and coordinated services are delivered, engaging the service user.	<p>Is the sentence/post-custody period implemented effectively with a focus on engaging the service user?</p> <p>a) Do the requirements of the sentence start promptly, or at an appropriate time</p> <p>b) Is sufficient focus given to maintaining an effective working relationship with the service user?</p> <p>c) Are sufficient efforts made to enable the service user to complete the sentence, including flexibility to take appropriate account of their personal circumstances?</p> <p>d) Post-custody cases only: Was there a proportionate level of contact with the prisoner before release?</p> <p>e) Are risks of non-compliance identified and addressed in a timely fashion to reduce the need for enforcement actions?</p> <p>f) Are enforcement actions taken when appropriate?</p>	<p>Does the implementation and delivery of services effectively support the service user's desistance?</p> <p>a) Are the delivered services those most likely to reduce reoffending and support desistance, with sufficient attention given to sequencing and the available timescales?</p> <p>b) Wherever possible, does the delivery of services build upon the service user's strengths and enhance protective factors?</p> <p>c) Is the involvement of other organisations in the delivery of services sufficiently well-coordinated?</p> <p>d) Are key individuals in the service user's life engaged where appropriate to support their desistance?</p> <p>e) Is the level and nature of contact sufficient to reduce reoffending and support desistance?</p>	<p>Does the implementation and delivery of services effectively support the safety of other people?</p> <p>a) Is the level and nature of contact offered sufficient to manage and minimise the risk of harm?</p> <p>b) Is sufficient attention given to protecting actual and potential victims?</p> <p>c) Is the involvement of other agencies in managing and minimising the risk of harm sufficiently well-coordinated?</p> <p>d) Are key individuals in the service user's life engaged where appropriate to support the effective management of risk of harm?</p> <p>e) Are home visits undertaken where necessary to support the effective management of risk of harm?</p>

		g) Are sufficient efforts made to re-engage the service user after enforcement actions or recall?	f) Are local services engaged to support and sustain desistance during the sentence and beyond?	
Reviewing	Reviewing of progress is well-informed, analytical and personalised, actively involving the service user.	<p>Does reviewing focus sufficiently on supporting the service user's compliance and engagement?</p> <p>a) Does reviewing consider compliance and engagement levels and any relevant barriers, with the necessary adjustments being made to the ongoing plan of work?</p> <p>b) Is the service user meaningfully involved in reviewing their progress and engagement?</p> <p>c) Are written reviews completed as appropriate as a formal record of actions to implement the sentence?</p>	<p>Does reviewing focus sufficiently on supporting the service user's desistance?</p> <p>a) Does reviewing identify and address changes in factors linked to offending behaviour, with the necessary adjustments being made to the ongoing plan of work?</p> <p>b) Does reviewing focus sufficiently on building upon the service user's strengths and enhancing protective factors?</p> <p>c) Is reviewing informed by the necessary input from other agencies working with the service user?</p> <p>1.1.</p> <p>d) Are written reviews completed as appropriate as a formal record of the progress towards desistance?</p>	<p>Does reviewing focus sufficiently on keeping other people safe?</p> <p>a) Does reviewing identify and address changes in factors related to risk of harm, with the necessary adjustments being made to the ongoing plan of work?</p> <p>b) Is reviewing informed by the necessary input from other agencies involved in managing the service user's risk of harm?</p> <p>c) Is the service user (and, where appropriate, key individuals in the service user's life) meaningfully involved in reviewing their risk of harm?</p> <p>d) Are written reviews completed as appropriate as a formal record of the management of the service user's risk of harm?</p>
Evaluation	Evaluation of early outcomes is positive, demonstrating progress in relation to engagement, desistance and the safety of other people, with a clear strategy for sustaining and building upon	<p>Is there evidence of sustainable progress in terms of the service user's engagement?</p> <p>a) Have positive relationships been established with the service user?</p> <p>b) Have there been improvements in the service user's motivation and readiness to engage?</p> <p>c) Has there been a reduction in non-compliance?</p> <p>d) Is there a sufficiently comprehensive and up to date strategy for delivering</p>	<p>Is there evidence of sustainable progress in terms of the service user's desistance?</p> <p>a) Have there been improvements in those factors most closely linked to offending?</p> <p>b) Have there been increases in the service user's strengths and protective factors?</p> <p>c) Has there been a reduction in offending?</p>	<p>Is there evidence of sustainable progress in supporting the safety of other people?</p> <p>a) Has there been any reduction in the risk of harm to others?</p> <p>b) Has there been a reduction in serious violent/sexual offending?</p> <p>c) Have specific victims been protected?</p> <p>d) Is there a sufficiently comprehensive longer-term strategy for sustaining and</p>

	these outcomes.	the remaining requirements of the sentence?	d) Is there a sufficiently comprehensive longer-term strategy for sustaining and building upon the progress achieved to date?	building upon the progress achieved to date?
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