

Invitation to Negotiate - Transforming Rehabilitation Programme

WSA 5 Question 1 – Generic Response Attachment 1

QUALITY ASSURANCE ARRANGEMENTS

Introduction

Sodexo is an experienced provider of justice services to government and will use this experience to operate the quality assurance arrangements set out in this document. We have used the supplied quality assurance model for offender management as the basis for our approach and combined this with elements of our existing systems and performance management structures and our delivery approach to Transforming Rehabilitation. To ensure compatibility with Authority based evaluation we have used the same set of principles and activities, applying them to our particular approach and drawing on our experience. The advantage of taking this approach is that it will allow for some comparison across CRCs by MoJ whilst allowing innovative practices to be incorporated.

Within our model we have linked Quality Assurance to our overall Performance Management Strategy so that statutory duties, contractual requirements, standards and quality assurance can all be considered in a holistic way.

Our delivery model is based on the application of desistance theory which is itself evidence and research based and aligns with SEEDS (Skills for Effective Engagement, Development and Supervision) methodology which we will use across the CRC with staff involved in offender contact roles.

As part of our desire for continuous improvement we will engage Matrix Knowledge, the designers of the NOMS performance hub and international experts in the analysis of economic and other data relating to social policy. Our plan for continuous improvement through the lifetime of the contract is founded on the continuation of that strategic partnership and the delivery of a bespoke management information and operational evaluation system linked to our new case management IT (OMS). Matrix will provide independent analysis and evaluation of what works in reducing reoffending which will contribute directly to assessment of quality in relation to our deliver, but will also inform the development of knowledge and understanding of what works more generally.

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Principles of Quality Assurance

1. The assessment of “sufficient” quality is based on proven and promising evidence of likely effectiveness and the HMI Probation benchmark

Our approach to delivery is based on desistance theory which has an evidence base that is proven. Our delivery model is designed to apply the principles of desistance theory to offender management through seven design principles:

- **A person-centred approach: fair, reasonable, individualised** - designing plans with each offender that are uniquely tailored to their circumstances and ambitions.
- **Motivation at its core** – assessment and prioritisation tools will take account of the risk needs and responsivity, but also a new factor, which we have called “closeness to change”, designed to reflect the crucial importance of the offender’s own motivation and commitment to change - a new 2 stage tool designed for us by Professor Sam King of Leicester University
- **Founded on strong and meaningful relationships** - skilled and qualified staff spending the majority of their time in face to face relationship building work, alongside sequenced and targeted programmes that address specific offence related issues, including cognitive behavioural deficits.
- **Providing practical help for a crime free life** - enabling offenders to access a full range of support under the existing offending behaviour pathways.
- **Achieving and sustaining the development of a non-criminal identity** - focusing relentlessly on the offender’s potential and opportunities, using ex offenders in our delivery to inspire, motivate and support.
- **Engaging the offender’s community** - delivery of specific functions through a supply chain, contributing to local delivery of services and reflecting local priorities.
- **Delivered holistically** - making our offender management system accessible to a wide range of partners to contribute to local understanding of what works in reducing reoffending.

These design features align with the latest research evidence on desistance, in particular the work of Professors Shadd Maruna and Fergus McNeill, the Evidence Summary on Reducing Re-offending, the results of the NOMS Offender Engagement Programme, the latest HMI quality benchmarks and the National Standards. They will be updated to reflect emerging research evidence of what works. They will be supported by the implementation of the SEEDS programme of staff development and supervision and Sodexo’s own Personal Development Review process. Together these approaches provide a means of monitoring and evaluating individual performance, addressing deficiencies and sharing learning and good practice.

These will all form the basis of our monitoring and our OMS will provide a comprehensive real time data and reporting facility to support this and identify performance holistically in terms of statutory duties, contractual requirements, standards and quality assurance.

2. There is a consistent focus on outcomes

Our approach is to focus on the key requirements to:

- **Deliver the sentence of the Court ensuring compliance with requirements** – the elements to achieve this include:
 - Ensuring we are responsive to the needs of sentencers through the range and scale of interventions available
 - Providing sufficient resources to meet demand

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- Robustly managing the requirements of every order/sentence
 - Taking rapid and appropriate breach action as required
 - Developing individually tailored plans for every offender, involving them in the assessment and ongoing review process through use of the Outcomes Star system providing a visual and interactive means of bringing together the different elements that will go to make up an offender's achievement plan. Holding all parties to account for the delivery of the plan.
 - Case allocation and ongoing monitoring of supervision within a central Hub facility to manage performance
- ***Prioritise public protection*** – the need to prioritise and deal effectively with public protection issues will be focussed on:
 - Strong strategic partnerships delivering joined up work. Staff structures are designed to facilitate effective liaison and partnership working at all levels.
 - Effective collaboration with the NPS supported from Chief Executive through to frontline staff.
 - Competent, knowledgeable and decisive staff - who have been appropriately trained, effectively supported and whose work is regularly reviewed against a competency framework.
 - Lean, clear processes for risk assessment and management – based on a central hub providing a single point of contact in the CPA for receiving all referrals for new work, undertaking an initial risk screening, provisional case allocation and providing ongoing monitoring of processes and requirements helping to maintain a dynamic approach to risk.
 - ***Reduce the incidence of crime through reducing reoffending*** – our whole delivery model is built around what will work to reduce reoffending and assessment and allocation procedures facilitate this and assist in the allocation of appropriate levels of resource on the basis of risk, needs, responsivity and closeness to change. Elements that will support this include:
 - Outcome based delivery built in to staff induction and training programmes
 - Individual and team based targets for achieving standards, contractual requirements and reducing reoffending outcomes
 - Ongoing monitoring and evaluation by a dedicated Sodexo Performance Management and Improvement Unit
 - Regular reporting at LDU and team level against performance targets and identification of areas for improvement
 - Sharing of what is working from the evaluation by Matrix Knowledge across the CPA.

3. **There is a holistic approach**

To be effective quality assurance needs to be integrated into front line practice as well as in management and monitoring systems. Within this context we will use the following elements to ensure a broad approach to assessing quality throughout the CRC.

- ***Checking practice as a whole, and in context, covering all elements of good quality practice*** - this will be driven by a systematic approach to assessing quality built on a template approach that includes all relevant elements that go to make up the entirety of offender management based on a competency framework. Templates will be available for use by individual staff in relation to their own performance as a case management tool, by teams and LDUs to assess group performance and identify good practice as well as by the central Performance Management Unit. Templates may include the following elements but will be designed for each event.

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- Risk assessment and management
 - Offender Assessment and planning (including the use of Outcomes Star)
 - Decision making and holding to account against sentence plan (including appropriate enforcement)
 - Offender Engagement with planning and ongoing activity
 - Appropriate allocation to interventions
 - Partnership working with other statutory and voluntary providers
 - Community integration and appropriate referral to service provision
 - Appropriate record keeping of decisions and professional judgement
 - Case reviews/outcomes undertaken effectively as a case management tool
- ***Using a range of indicators of quality*** – we will include a range of methods to assess the overall quality of our service delivery. These will include:
 - Ongoing monitoring of caseload activity through OMS by individual staff, managers and the PMIU
 - Review of performance statistics and evaluation data from our contract with Matrix Knowledge
 - Case record reviews on OMS
 - Practitioner interviews
 - Practice Observations/Site visits
 - Offender interviews/questionnaires
 - Staff group exercises to explore specific issues
 - Offender focus groups
 - Review of stakeholder/sub-contractor feedback

We will review inputs, process and outputs as part of our QA arrangements in so far as they contribute to outcomes and produce cost effective offender management solutions. The focus will be on the quality of these elements and our work with Matrix will enable further evaluation of the impact of the inputs, processes and outputs in achieving the desired outcomes. Process in particular can become a driver in itself regardless of effectiveness and we will put in place a review programme for all policies and procedures to ensure that they remain relevant, effective and provide value for money. The programme of review will be included in our annual work programme within the Performance Management Strategy.

- ***Awareness of the potential for bias*** – we recognise our statutory duty under the Equality Act 2010 to ensure equality of opportunity for all, including those within the nine protected characteristics identified in the Act. In relation to assessment of quality we also recognise the potential for bias to affect judgement and will take the following action to avoid this.
 - Include an evaluation of demographic and other local data to provide context, alongside internal data relating to the composition of both the offender cohort and staff group. This will be facilitated by OMS, which will allow for analysis of outcomes across the protected characteristics. This will be a rich data source which, together with other information streams such as the offender survey, will allow us to check for potential and actual areas of disproportionality and take corrective action.
 - Include practitioner staff in any quality assurance arrangements to improve understandings and identify potential bias
 - Discuss outcomes and judgments with staff groups to gain insight into potential bias
 - Staff focus groups as part of QA process and design to share perspectives

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4. Work on assurance is fully integrated with work on improvement and development

To ensure full integration of the process of QA into improvement and development activity it will be the responsibility of a central Sodexo Performance Management and Improvement Unit (PMIU), led by an experienced senior manager and supported by dedicated staff with appropriate capability and professional experience. A contract with Matrix Knowledge will support evaluation of performance, ensure improvement over time and provide data analysis, performance quality improvement advice and support. Matrix provides similar services to the MoJ and brings independence to the quality assurance process. The PMIU will produce an annual Performance Management Strategy (PMS). The PMS will outline roles, responsibilities and requirements for monitoring, evaluation, audit and QA; allocate responsibility for responding to findings, delivery of remedial plans, and management of underperformance. It will identify annual team and individual targets for all frontline staff based on Schedule 9 service levels as a minimum. The PMS will also include:

- The Annual Audit Plan – detailing the planned audit programme for the year.
- Annual Quality Development Plan – detailing the planned QA programme for the year.

In both cases the PMIU will use OMS data to identify other areas for spot check or review during the year on the basis of business or contractual risk.

The main functions of PMIU will be:

- **Monitoring** - routine and ongoing monitoring of every element of the Services Agreement using our bespoke Offender Management System (OMS) developed by Unilink our IT provider giving real time case management/performance data for managers and staff and monitoring data for PMIU. The PMIU will monitor the implementation of our Operational Delivery Model working with Matrix to ensure the principles of our reducing reoffending strategy are evaluated and learning is integrated into ongoing delivery. Our delivery model is based on Desistance Principles which are evidence based and measurable.
- **Evaluation** – data will be capable of evaluation against each service element/item, delivery sites, sub-contractor and staff member in any combination against the service specification and quality standards. It will identify where performance is exceeded, met, not met or seriously deficient. Managers of Sodexo staff will explore the reasons for poor individual or team performance, Partnership Managers will undertake this with sub-contractors. Our contract with Matrix will identify the success rates and “what works” data related to reducing reoffending.
- **Reporting** – the PMIU will provide monthly reporting data for the Authority, management information for Sodexo managers and staff, sub-contractors/partners, producing reports in the required format (including making these available from nDelius) for Authority use. The reports will cover all Services Agreement requirements and all applicable quality standards. The PMIU will provide reports required by our PMS including performance data, business risk analysis against contractual requirements and partner/sub-contractor performance data for contract monitoring purposes.
- **Compliance & Audit** – the PMIU will continuously monitor performance across the contract area, including sub-contractor performance. Spot checks on a programmed basis or as a result of identified business risk will take place. All audit procedures will comply with Public Sector Internal Audit Standards. Annual full audits will be carried out including the use of seconded staff from

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partner or sub-contractor organisations if appropriate. Audits and spot checks will include data analysis, site observation visits and user feedback. Audit reports will be used to identify delivery risk areas by service specification, local delivery unit performance, quality assurance measures or sub-contractor delivery. Deeper audits will occur where performance against the contract falls below the required level by more than 5%. The PMIU will agree and monitor improvement plans in order to meet standards, reporting progress to the Chief Executive and Senior Team. The audit and improvement reports will be provided to the Director of Operations and the Board as well as the Authority. Subcontracts will contain incentives to ensure delivery to required standards and contribution to reducing reoffending without pass down of PbR risk. Sodexo will contract with Charities Aid Foundation (CAF) to advise on selection processes for Tier 2 & 3 providers and to carry out audits of Sodexo performance as a partner/commissioner to the VCS. This ensures the supply chain is fair and transparent, integrated into contractual performance regime, supportive of our delivery model and contributing to improvement in quality and delivery outcomes.

- **Management of Performance/Quality Assurance** – Specifically focussing on the QA principles outlined above the PMIU will plan and carry out quality assurance checks for the CRC in line with the annual Quality Development Plan or in relation to concerns that arise during the year. This plan will be agreed with the Sodexo Board and the CRC Chief Executives. The focus will be on identifying good or exceptional practice as well as identifying deficiencies. Staff from the CRC will be seconded to assist with both QA exercises and audit and these may be combined in order to maximise use of resources. This approach will ensure that individual staff can become skilled at evaluating their own practice, learning is spread and development activity is integrated throughout the organisation.

All CRC staff will be subject to a performance management regime that has two components. The first will be a regular progress review with a line manager to review performance against team and individual targets based on contractual requirements and standards and on audit and QA findings. Performance will be rated on a matrix identifying where benchmarks are exceeded, met, not met or seriously deficient. Line managers will investigate reasons for under-performance and agree remedial actions with staff, including supportive development activity, training, mentoring, practice observation or case reviews. Individual performance falling below requirements for 3 consecutive months will trigger a formal review and Personal Performance Improvement Plan to address issues. The second element will be a Personal Development Review (PDR) setting annual objectives, personal development plans and training requirements based on the role and the needs of the individual alongside contract requirements. Induction training for new and transferring staff will prioritise performance and quality standards. This will drive consistent performance across the CRC focussed on outcomes, share best practice and deal with underperformance.

A similar process will apply to subcontractors under the contract management regime, including provision of support for the subcontractor organisation to improve performance. They will be responsible for monitoring and managing the performance of their own staff and evidence of their capacity for this will be part of the selection process. Failure of a subcontractor to improve performance to required levels after supportive improvement activity may result in remedial action.

- **Feedback** – to ensure that the learning from audit and QA review is integrated into everyday practice the PMIU will:
 - Involve practitioners, sub-contractor staff and staff of key stakeholders (e.g. IOM staff) as part of QA review & Audit Teams
 - Encourage and support self audit and assessment
 - Monitor LDU, team and individual improvement plans

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- Share the findings of audits and QA reviews across the CRC and with sub-contractors and stakeholders as appropriate
- Ensure that good practice is disseminated as well as areas for improvement
- Encourage feedback and dialogue to develop understanding of issue and context
- **External Audit & Inspection** - the PMIU will also coordinate External Audit, HMIP Inspections and SFO reviews and will be responsible for ensuring that learning from these is integrated into annual plans at CRC, LDU and individual staff level. This centralisation of all activity related to Assurance, Improvement and Development will ensure a more consistent application and approach to QA and to the integration of learning into practice across the CRC area.

Delivery Methodology

The PMIU will produce an annual plan for audit and QA reviews. Working with key stakeholders (e.g. PCC, Health Boards, Police, NPS) we will also explore the potential for joint exercises in QA review, especially in those case where significant input is made by others. Our delivery model for TR relies heavily on joint delivery, co-location and shared commissioning – it is therefore logical to consider joint approaches to quality assurance and audit.

The approach to QA in the annual plan is for it to become a shared activity driven, facilitated and monitored from the centre, but delivered locally as part of ongoing management and staff supervision and support as part of the SEEDS approach. For each review element in the annual plan there will be a specific methodology drawn up and based on the following key components.

- **Case auditing** – using the following:
 - OMS and its reporting functions to report against CRC, LDU, Team and individual performance
 - Input from Matrix Knowledge as part of its ongoing evaluation of our data for effectiveness and quality
 - Involving staff from sub-contractors and key stakeholders as part of audit/QA teams
- **Observation of practice** – either directly or through use of video or live link. We will use the SEEDS model of observation and practice observation checklist as the basis for this. Managers will normally undertake observation of their staff or may share this across teams. They will be trained in the SEEDS methodology to support this.
- **Continuous Professional Development** – we will use the SEEDS approach linked with our own Personal Development Review system to develop a culture where staff want and expect to be developing their practice in a continuous improvement setting. Whilst deficient practice will be identified through our reviews there will also be a focus on identifying best practice and sharing this. Alongside this will go a comprehensive programme of staff support, coaching and mentoring in order to drive up quality and final outcomes.
- **Stakeholder Feedback** – is integral to our approach and essential in gaining a contextual view of performance overall. We will seek feedback from the following:
 - Offenders – we will undertake a six-monthly offender survey and construct an action plan to meet any concerns arising from it, and ensure that satisfaction levels meet the requirements of Part 3 of Schedule 9 to the ASRA. We intend to use the SEED survey for this purpose. We may also conduct specific offender surveys or focus groups in relation to specific audit or QA activity.

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We have formed a strategic partnership with User Voice and we intend to establish User Voice facilitated councils for offenders in each CRC we own. The User Voice model is unique in its adoption of democratic principles and processes and the independent support provided to ensure that the Council is effective and carries real influence in the strategic and operational development of the service involved.

- Staff – we will undertake a staff engagement survey every two years in line with Sodexo UK policy, and apply the learning to improve. The survey has just been completed for the current year and results are awaited.
- Supply Chain – we have used the services of the Charities Aid Foundation (CAF) to enable us to understand more clearly: the composition of the sector, its strengths and weaknesses; the needs of both Tier Two and Tier Three providers in terms of developing to meet the challenges of transforming Rehabilitation; and the characteristics of a good Tier One partner. CAF will be involved in the ongoing evaluation of our performance as a Tier One provider on an annual basis. We will also hold quarterly reviews meetings with our supply chain partners and encourage informal feedback as part of that process to supplement an annual survey.
- Sentencers & Court Users – we will aim for a direct involvement with sentencers in order to showcase our interventions and receive feedback on the range, scope and quality of delivery.
- Victims – through our work with Restorative Justice Initiatives we will seek the views of victims on their experience. We also have a strategic partnership with Victim Support at national level to enable to maintain victim awareness in our delivery approach.
- Statutory and Community Stakeholders – we will carry out an annual survey of all stakeholders but our vision is that the CRC will be an intrinsic part of local services, and we will notice and take action on concerns from stakeholders as and when they arise rather than waiting for survey results.

We will consider the following in relation to each of these components above:

- What is the activity and how will it be carried out?
- What resources are required?
- How are the results collated and communicated?
- Diversity Bias & Discrimination?
- How does the activity support the QA Principles above?

The PMIU will be responsible for drafting the detailed plan against these elements basing the overall approach on the Guidance Document and the model Grading Criteria. The PMS will schedule and coordinate activity taking into account local demographics, characteristics, composition of the staff group, offender/offence profiles and monitoring data and will ensure that resources are most effectively used across the CRC.