

The Role / Purpose of Independent Approved Premises

Up until 2001 Approved Probation and Bail Hostels (APBHs) were primarily a residential option for offenders who were on bail, probation or licence. The basis of the accommodation was driven primarily by social and housing needs rather than risk management.

The risk management agenda which emerged throughout the late 1990s, did so at a time when there was increasing concern about the costs associated with running APBHs. Within this context and informed by 'what works' research it was decided that this expensive resource should be used primarily with regard to risk assessment and management of offenders with a clear link to public protection. Therefore the focus of work was re-directed at working with very high and high risk of harm offenders.

The change in terminology from Approved Probation and Bail Hostels to Approved Premises (APs) was in part to show a clear demarcation between the old world and the new, in that the Approved Premises estate was not just about housing needs and accommodation, but driven by public protection. With this aim in mind there was a clear link between rehabilitation and resettlement within a focused risk management framework.

Historically there has been a mixed economy of service provider provision with a combination of the independently managed Approved Premises (IAPs) Probation Trust APs and from 2014 the National Probation Service (NPS) APs. This has morphed into what is now known as the Approved Premises estate. There are currently eight providers of IAPs nationally, providing eleven premises. Out of these eight are for men and three are for women. In the women's estate 50% of the provision is provided by IAPs. (See Appendix 1, page 6, for a breakdown of IAPs).

The clear expectation throughout has been, regardless of whether the provision was probation managed or independently managed, that the service specification requirements were consistent. This is reflected in much of the source material to date including the HMIP inspections and work around the specification benchmarking and costing program in 2009. The latter involved both the IAPs and NPS APs and informed the content of the current service specification. The guidance that exists in the form of the Approved Premises handbook, has been informed by significant contributions from both the Independent and probation sector.

Clearly since 2001 the thrust of circulars and policy has been for APs regardless of provider to work to the same remit. This being to manage predominantly high and very high-risk offenders in the male estate, with provision being extended to medium risk of harm offenders in the women's estate.

There is some local variance (which should be legitimate and defensible) regardless of provider. An example of this was the decision to restrict admission policies for some APs via a ministerial ban, which prevented some APs taking child sex offenders.

Over this period and to date there has been a number of initiatives to focus and confirm the purpose of the Approved Premises estate.

The implementation of Approved Premises performance standards in 2006 was aimed at ensuring quality and performance consistency across all APs, and had a

clear 'focus principally on the role of Approved Premises and delivering public protection'. (then informed by PC 15/2005 national standards, PC/37 2005 the role and purpose of Approved Premises and PC 15/2006 guidance on implementations of practice recommendations)

There were 10 standards:-

- AP1 resources for high-risk work
- AP2 high risk map arrangements in place unknown
- AP3 risk management and enforcement
- AP4 monitoring and surveillance
- AP5 relationships with the local community
- AP6 Managing vulnerable residents
- AP7 suicide / self harm
- AP8 illegal drugs policy and procedures
- AP9 resettlements and reintegration
- AP10 diversity / maximising intrusion

The use of this expensive resource is monitored with this in mind, by way of the H1 return which collects statistical returns from all the Approved Premises in the country.

The current nature of the work of Approved Premises including that of the IAPs to provide premises that manage high to very high risk offenders has been well recognised over this period. This was reflected in the Transforming Rehabilitation agenda which placed Approved Premises in the National Probation Service as apposed to the CRCs which focused on low and medium risk offenders. The women's estate works effectively with both organisations in their capacity to work with medium risk as well as high and very high risk of harm women offenders.

Within the context of the Performance Standards and the drive to consider the use of resources effectively a number of the Approved Premises in the country (both IAPs and NPS), were heavily engaged in the cost benchmarking pilot. Again this exercise gave credence to the quality of the work in Approved Premises and its ability to meet the aims of risk management. This led to the current performance specification.

Concurrent with this work was the HMI inspection in 2008 which investigated work carried out in both the IAPs and NPT Approved Premises. This concluded that the estate needed to continue its focus on public protection and the management of high risk offenders within a 'green housing' rather than a 'ware housing' framework.

There have been attempts at evaluating the cost of running APs in recent years within this it has been difficult to come up with comparative costings between IAPs and NPT APs (although the HMIP inspection did consider this). This is because amongst other things much of the back room servicing of the NPS Approved Premises is managed at an organisational level. It was therefore difficult to compare backroom operational costs in relation to both parties. That said it was considered that the NPT APs were in some circumstances cross funded from general trust budgets which was not available to the independents in the same way. The actual cost of running the Independent approved premises estate has been very clearly defined for many years and remains so.

Prior to the current restructuring leading to the National Probation Service many of the IAPs had protocols in place which ensured that there was a good interface between providers. Alongside a shared service provision to meet need this also covered the provision of joint training for example in relation to the National risk management training package and more recently KUF training.

The unique selling points of Independent Approved Premises

In terms of the three main functions of APs, public protection, rehabilitation and accommodation there is no difference between IAPs and NPS APs. The IAPs have a contract with NOMS to deliver the service, which embraces the service specification and all the required policies and procedures.

The majority of IAPs are governed by Boards of Trustees that meet on a regular basis. Some IAPs have charitable status and some have links to faith based organisations. There are many differences in terms of the parent bodies of IAPs, but what is clear is that whatever the parent body or background all IAPs work to deliver the service specification to the same high standards as the NPS APs.

Many IAPs report that there is some confusion in NOMS and the NPS relating to their status and governance. For example, some staff are not aware that IAPs deliver the same service and may refer to IAPs only if the NPS APs are full, expecting a different or secondary service. Others appear unclear about whether NPS will be charged a fee for their resident and do not appreciate that IAP's are contracted to deliver the same service as NPS AP's. There is also a belief that IAPs are able to draw on funds provided by their parent bodies. Some IAPs may be part of larger organisations, but funding is strictly separate with IAPs meeting all service delivery and running costs from their contract fee. Some IAPs are able to receive donations from their local community which is used to benefit residents, but where this is the case this is used to improve on or add value to facilities or services for residents, not to facilitate the running of the APs in accordance with the service specification. Other IAPs are run by small organisations with no other business and receive no donations. It is therefore a myth that IAPs have other money from their parent bodies that they can draw on. IAPs have to meet all costs of service delivery from the income that they get from the contract.

Many of the IAPs own their own buildings and given that they are not subject to the Facilities Management Contract and have greater control of their buildings in terms of decor and facilities, this is a benefit for residents. IAPs also have more opportunities to ensure that repairs and improvements are cost effective and environmentally friendly. For example, some IAPs have fitted solar panels to assist with the supply of electricity. Others have energy efficient lighting. All utilise local trades people in terms of maintenance and decoration, which in addition builds links with the local community and benefits the local economy.

Many IAPs have very strong links with the local community in which they are based. Trustees / Management Committee members often come from the local community and can help to support and promote the positive work of the APs in the local area, which can be very important in terms of community engagement / relations. Any issues can often be picked up and dealt with before they escalate because of these local links. These links were cited as a good practice example in the Joint Inspection of Approved Premises in 2007 (Probation Hostels: Control, Help and Change?).

The IAPs are able to develop links with local stakeholders and contribute directly to the local economy. Freedom to purchase food, drink, furniture and other services locally from shopkeepers and other tradesman not only ensures that the APs get value for money, but also enables the APs to contribute directly to the local economy, which in turn can raise the positive profile of the APs.

In terms of catering there is a range of provision amongst the IAPs with some offering self catering , others fully catered and some mixed. However, what is clear is that having the freedom to manage this and employ cooks where required enables diverse provision that benefits residents and the local community. A range of quality food for particular diets and allergies can be provided without difficulty. Where staff are employed as cooks and cleaners, they are integrated in the staff team and as well as adding to the positive atmosphere they are sometimes the ones to spot signs of escalating risk. Staff employed via contractors are generally not part of the APs in the same way. This was also regarded as very positive by inspectors during the joint inspection in 2007.

All APs deliver a range of interventions to residents. The IAPs have greater flexibility in terms of what is delivered and how staff are utilised to assist delivery. For example gardening, allotment, furniture restoration, outdoor activities and cookery classes are facilitated across some of the IAPs, which enables residents to develop skills and confidence. Rota's and restrictions on the use of staff and some facilities makes it more difficult for NPS APs to offer the same opportunities.

In terms of staffing IAPs have greater flexibility, in that staff are not subject to the terms and conditions as set out by the NNC. IAPs maintain at least double cover at all times, but have greater flexibility in terms of how they utilise staff to do a range of tasks, rather than those dictated by a specific role. Hence a staff member may run an activity, be responsible for curfew checks and assist with meal preparation. This is all aimed at maximising the delivery of the service whilst utilising all the skills of the staff and allowing for the development of additional skills in the staff team.

In conclusion there is a clear 14 year history of APs working towards the same public protection agenda, measured in the same way and being encompassed by the same policies, procedures and directives from the centre. In some cases these policies and procedures have been refined and supplemented by local protocols between Probation Trusts and Independently Managed Approved Premises. These have had a clear aim which assured service need was met jointly irrespective of provider.

In addition the above points demonstrate that the IAPs add value to the Approved Premises estate in terms of service delivery. IAPs offer at least an equal service and are not tied to Facilities Management Contracts, so are better able to integrate with their local communities and contribute to the local economy. Greater flexibility in terms of staffing and innovation regarding interventions are also positive factors.

Source material

NAPA - Response to transforming rehabilitation CP 1/2013 - 22/02/13 (this considers the levels of risk with which the approved premises estate are engaged and the importance of the estate remaining in the public sector)

NAPA - Response independent Approved Premises providers funding 2011/12 07/01/11 (this debates funding issues relating to the Independent Approved Premises)

Approved Premises service review December 2007

(recommendations within this review are predicated on a shift of NOMS resources to high-risk offenders; clear operational policy directions and the requirements for a defensible and minimum standard regime for the management of high-risk offenders)

Approved Premises resources review September 2004 and related correspondence 04/11/2005 and 24/01/2006 (relates to 4 objectives; resource needs, performance indicators, staffing structures and technology needs. This also introduced the performance standards)

Outline estate strategy for approval premises February 2006 (A needs mapping survey to determine whether there is sufficient bed spaces to accommodate the regions high risk of harm offenders. This also considers whether Approved Premises within the estate are fit for purpose)

Implementation of Approved Premises performance standards PC 19/2006 15/05/2006 (seeks to introduce a national framework to support and evaluate the delivery of public protection and interventions by Approved Premises)

Public protection and community safety: Approved Premises and offender housing strategy for high-risk offenders. February 2005 (this emphasises the expertise APs have for managing higher risk offenders. It affirms a long-term trend in the interests of public protection and emphasises the need to focus resources on very high and high risk of harm offenders)

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02/07/15

Appendix 1

Independently Managed Approved Premises (IAPS) 8 providers 11 Premises

Approved Premises	Provider	Location
Ozanam House	SVP	Newcastle –upon Tyne
St Christopher's	SVP	Newcastle-upon-Tyne
Hestia Streatham	Hestia	London
Hestia Battersea	Hestia	London
Katherine Price Hughes House	West London Mission	London
Ashley House		Bristol
St John's	Knights of St Columba	Leeds
Cardigan House	Ripon & Leeds Diocesan Council for Social Concern	Leeds
Ripon House (Women)	Ripon & Leeds Diocesan Council for Social Concern	Leeds
Adelaide House (Women)	Liverpool Cof E Council for Social Aid	Liverpool
Elizabeth Fry House (Women)	Elizabeth Fry Charity	Reading