



Sir Robert Neill MP
Justice Committee
House of Commons
London
SW1A 0AA

MoJ ref: 105108

26 April 2023

Dear Sir Bob,

IMPRISONMENT FOR PUBLIC PROTECTION (IPP) ACTION PLAN

Following the former Lord Chancellor and Secretary of State's letter of 31 January 2023, in which he committed to reviewing and refreshing the IPP Action Plan, I am pleased to now be able to share the updated IPP Action Plan with you.

I am confident that the refreshed Action Plan will deliver the best possible opportunities for those serving an IPP sentence to progress towards a safe and sustainable release. I will ensure that the plan delivers real change by reducing the IPP population both in custody and in the community whilst prioritising public protection.

His Majesty's Prison and Probation Service (HMPPS) has taken into consideration the specific concerns raised in the Committee's report and have focused on developing a set of work streams with clear deadlines and, importantly, a robust governance structure that will hold officials to account for delivery. HMPPS are committed to reviewing the plan's scope and objectives every six months, through the identified governance structure, to ensure we are taking all possible steps to support prisoners towards release.

IPP Action Plan Overview

The refreshed IPP Action Plan focuses on ensuring that HMPPS systems and processes effectively support those serving an IPP sentence towards a safe and sustainable release. The priority is delivering, consistently well, the core fundamentals of sentence management and the HMPPS systems that enable progression in every prison and probation region, so that innovative interventions and services can be accessed and delivered to best effect. This objective is underpinned by four principles:

Principle 1: HMPPS monitors and publishes data on how those serving the IPP sentence are progressing through their sentences, whether in custody or the community.

Principle 2: HMPPS ensures that those serving an IPP sentence have a sentence plan specifying the required interventions to reduce risk and has access to them

Principle 3: Community provision for and management of those on an IPP licence gives people the best prospect of a future safe and sustainable life outside of the justice system.

Principle 4: HMPPS communicates effectively with all stakeholders, including engaging on current plans, activity, and outcomes.

These high-level principles will underpin the central IPP Action Plan's six workstreams (**Annex A**), with each workstream now owned by a senior leader in HMPPS. The workstreams are as follows:

Deliver a core minimum service of IPP support in Prison and Probation Regions: This workstream will ensure that each prisoner serving the IPP sentence receives the support s/he needs to complete all the work and formal interventions which are set out in the prisoner's sentence plan. It will achieve this by ensuring all staff involved in sentence management understand their role and how it fits into the wider approach to managing offenders through the system. Further, it will ensure the staffing model in HMPPS matches the need in supporting IPP progression, including where more staff time and focus would benefit critical stages of progression, such as in the lead up to a parole hearing. The sentence management framework will outline the core fundamentals of support that HMPPS should have in place in every prison and every Probation Delivery Unit.

Progression through the HMPPS system: Ensuring that HMPPS systems, policies and processes work well to allow the core minimum service outlined above, to be delivered effectively. This includes developing a first formal policy framework for 'progressive prison transfers' to help enable the swifter and more effective movement of those serving IPP sentences through prisons. Further, a review of practice in delivering the multi-disciplinary 'Progression Panels' which discuss and plan next steps in the delivery of IPP offenders individual sentence plans, will lead to a first formal Policy Framework for this critical initiative in trying to build and maintain momentum in progressing cases, including those more complex ones, towards what is hopefully a future safe and sustainable life in the community.

Effectively supporting the Parole Process: We want to look at which aspects of the process of preparing for and delivering a parole hearing could be made more effective. To do this, we will complete a review of current challenges and present a set of proposed new actions to the IPP Progression Board, to be added to the Action Plan. These actions may include a focus on ensuring quality information to inform the process, and in reducing unnecessary delays.

Progression initiatives, innovation, and resettlement: HMPPS are conducting a needs analysis for the IPP population in prisons so that we are clear as to the wider needs of the remaining population and where there may be some gaps. Once complete, we will develop, deliver, and manage the required progressive initiatives and interventions. We will also identify how the wider HMPPS resettlement strategy can pick up the specific resettlement needs of those serving an IPP, so as to improve the quality of release plans and arrangements.

Population, performance monitoring and data publication: We recognise the need for improved tracking of the IPP population and associated performance, and on increasing transparency. This workstream will ensure that sound data and metrics are produced to effectively track performance across our practice in delivering the IPP Action Plan and case progression. Additionally, this workstream will identify and prepare new datasets to increase the amount of information on the IPP population in the regular publications, in support of increased transparency. This would include published numbers of those who have had their IPP licences successfully terminated, the total number of cases where the supervisory element of an individual's licence has been suspended, and further breakdowns of the location of the IPP population (those in secure hospitals and those on licence in the community).

Accountability for delivery:

Ensuring that the new approach to ownership, oversight and management of the action plan delivery is put in place and maintained, through the new governance approach, specifically the new IPP Progression

Board, as outlined in paras 7 and 8 above. This workstream will also cover actions to change our prison and probation operational-facing approach in the following ways:

- each HMPPS operational region/area, both prison and community operational delivery, will have its own IPP Operational Action Plan, underpinned by the central plan, covering an agreed set of workstreams;
- the Senior Leader for each operational region/area will be accountable to the Director General Operations for HMPPS for the delivery of that plan; and
- The operational action plans will feed progress into the new IPP Progression Board.

Accountability and Governance Structure

As stated above, HMPPS have significantly improved the action plan's governance structure to ensure a more robust ownership and accountability model throughout the agency. This is a vital improvement that will provide much greater impetus to the delivery of the plan.

The new senior IPP Progression Board will meet quarterly and will be chaired at Executive Director level. It will drive the completion of actions and monitor impact. Each of the six IPP Action Plan workstreams (Annex A) will report to the new Board, and leads will be directly accountable for the delivery of the identified actions within the workstreams. The new structure ensures responsibility for improving the progression prospects of those serving an IPP sentence is shared across the whole agency.

HMPPS will provide an annual report on progress against the IPP Action Plan actions, including the provision of relevant population data, the first of which will be published in March 2024.

Through a combination of increased regular data publication, qualitative reporting, and enhanced data analysis, I am confident that HMPPS will be much more effective in tracking the IPP population and responding to what that data and information tells us.

Ministers will also maintain oversight of the delivery of the plan to ensure that sufficient progress is being made.

I look forward to providing you updates of the IPP Action Plan and the successes that I am confident it will achieve.

Yours sincerely,



ALEX CHALK KC MP

LORD CHANCELLOR AND SECRETARY OF STATE FOR JUSTICE

HIS MAJESTY’S PRISON AND PROBATION SERVICE (HMPPS) IMPRISONMENT FOR PUBLIC PROTECTION (IPP) ACTION PLAN

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Section (1): IPP Action Plan Overview

The IPP Action Plan is the means to reducing the number of people serving an IPP sentence.

This refreshed plan focuses on ensuring that HMPPS systems and processes effectively support those serving an IPP sentence to maximise their prospects of achieving a safe and sustainable release. The priority is to deliver, consistently well, the core fundamentals of sentence management and the systems (HMPPS) that enable progression in every prison and probation region, so that innovative interventions and services can be accessed and delivered to best effect. This objective will be underpinned by a set of four overarching principles, as follows:

HMPPS IPP Progression Principles
Principle 1: HMPPS monitors and published data on how those serving the IPP sentence are progressing through their sentences, whether in custody or the community.
Principle 2: HMPPS ensures that those serving an IPP sentence have a sentence plan specifying their required interventions to reduce their risk and has access to them.
Principle 3: Community provision for and management of those on an IPP licence gives people the best prospect of a future safe and sustainable life outside of the justice system.
Principle 4: HMPPS communicates effectively with all stakeholders, including engaging on current plans, activity, and outcomes.

These high-level principles will underpin the central IPP Action Plan's six workstreams, outlined in section 4, with each workstream now owned by a senior leader.

HMPPS have made important changes to the how the IPP Action Plan is managed and monitored.

Section 3 outlines the new approach to the action plan's oversight within the agency (the governance structure), which will be commenced in April 2023 and rolled out fully in line with the timeframe for wider structural changes being progressed within HMPPS.

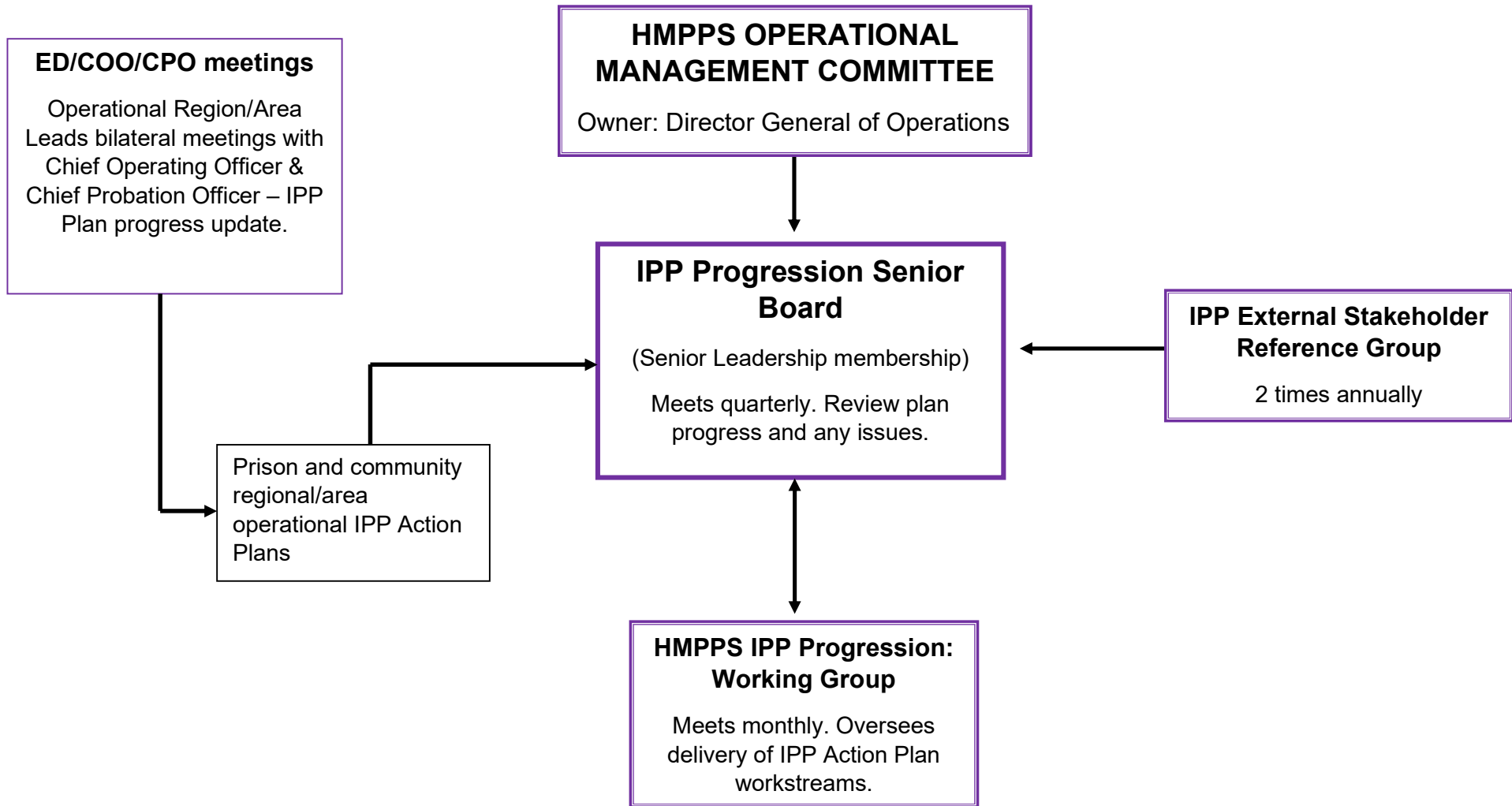
Robust accountability for delivery will be achieved through a new senior IPP Progression Board, which will meet quarterly and will be chaired at Executive Director level. It will drive the completion of actions and monitor the impact of the plan against its objectives. Each of the six IPP Action Plan workstreams will report to the new Board, and senior leads will be directly accountable for the delivery of the identified actions within the workstreams. The new structure will ensure that the whole agency has responsibility to deliver our commitment to support the progression of those serving IPP as far as possible.

An external stakeholder reference group, with representation from charities, campaign groups and inspectorates, will also be fed into the senior IPP Progression Board.

Through a combination of richer regular data publication, qualitative reporting, both internally and by external stakeholders, and enhanced data analysis, HMPPS will improve the efficacy of tracking and analysis of IPP population data. The specific success measures that will be used alongside this data are outlined in section 3.

An annual report on the progress of the Action Plan will be published, with the first of these reports made available in March 2024.

Section (2): HMPPS Progression Governance Structure



Workstream 2: Progression through the HMPPS system			
Lead	Chief Operating Officer (COO Prisons) Chief Probation Officer (CPO)		
Overview	<p>This workstream brings together a set of actions intended to ensure the HMPPS systems works well to enable the movement of those serving IPP through prisons and, where released by the Parole Board, a good prospect of a sustainable release. This would include the processes that impact on key transitions, in custody (e.g. prison transfers), from custody to the community and whilst on licence thereafter. Importantly, this workstream covers actions to ensure cases eligible for consideration to have their IPP licence terminated, are consistently referred to the Parole Board. The intention is to target areas of work that will minimise avoidable delay to progression.</p> <p>Moving through the prison system towards release and then having the best prospect of a sustainable life in the community will be the two key guiding priorities of this activity. Progression Panels and progressive prison transfers are, therefore, two important areas to deliver improvement in this work stream. This will include introducing the first formal operational policy framework for each. Further, this work stream targets recall policy and practice, ensuring it is used appropriately, and that effective support and actions take place, where possible, ahead of a point where recall is necessary. Additionally, this work stream will need to align with the Indeterminate Sentenced Prisoners (ISP) Progression Routes Working Group, led by the Director for Public Sector Prisons, which aims to identify pathways for Life and IPP prisoners who cannot access open conditions.</p>		
Actions			
Action	Summary	Deadline	
(1)	Test a new role responsible for resolving system-related progression issues (IPP Progression Lead/Officer)	<ul style="list-style-type: none"> Develop options paper and secure decision by senior leaders within HMPPS on preferred option to pursue; Options would include a regional IPP lead, tasked with oversight of cohort in region, or a single central role whose single responsibility would be to intervene in individual cases where there are system-related delays or issues, and to resolve them swiftly. Take final decision on long-term solution. 	September 2023
(2)	Deliver progressive transfers policy framework	<ul style="list-style-type: none"> Produce and publish a draft policy framework in consultation with appropriate stakeholders for progression through the operational governance process. This will formalise expectations on prison in regards sending and receiving prisoners for progressive moves, including which responsibilities are transferred (such as holding the pen on Parole administration activity). 	December 2023

(3)	Develop a remittance strategy for those not returning to prisons in the Long-term High Secure Estate (LTHSE)	<ul style="list-style-type: none"> Through the Health Directorate led Task and Finish Group, which reports into the cross-Government Mental Health Working Group. Complete an outline of the proposed remittance approach. 	August 2023
(4)	Deliver review of IPP prisoners' location	<ul style="list-style-type: none"> Produce a central dataset of the IPP population by prison, and commission Prison Groups, with support from Psychology Services, to review location against current needs. Summary report of findings to be discussed at Senior IPP Progression Board for any required action. 	May 2023
(5)	Produce a formal Progression Panel policy framework	<ul style="list-style-type: none"> Deliver a review of the Progression Panel initiative, covering custody and community cases, taking account of practice evidence, paying particular attention to their use around vulnerable periods such as immediately post-release Design a Quality Assurance (QA) framework for Progression Panels, and test and approve the process for use. Produce and publish a draft policy framework in consultation with appropriate stakeholders for progression through the operational governance process. 	October 2023
(6)	Review and refresh the policy for considering suspension of supervision	<ul style="list-style-type: none"> Refresh the policy and operational approach to ensure all eligible IPPs (who reach 5 continuous years in the community) are considered by a progression panel for referral to the Parole Board for consideration to have their supervision suspended. 	October 2023
(7)	Review recall practice	<ul style="list-style-type: none"> CPO sign off Terms of Reference for HMIP recall thematic; Complete a short, time-bound review of internal processes, particularly in relation to QA of recall decisions at the point of revocation and agree next steps with IPP Board. Develop and deliver communications approach to reinforce recall policy, understanding and expectations, including the use of risk management options such as licence variations, where appropriate. 	End Sept 2023 End Sept 2023 End Sept 2023
(8)	Produce a holistic 'management on licence' improvement plan	<ul style="list-style-type: none"> Develop a holistic plan drawing together all actions from this and other related action plans that the Probation Service are 	End June 2023

		delivering and get sign-off by the IPP Board. The plan will include direct actions to increase the number of IPP licence termination referrals.	
(9)	Develop and deliver expanded psychology services provision in the community to improve support through the gate	<ul style="list-style-type: none"> • Identify funding streams • Formalise community provision with Psychology Services Group (PSG) • Develop implementation plan • Deliver Services • Evaluate impact 	<p>Funding identified by June 23</p> <p>Commence service delivery by Oct 23 (subject to funding being identified)</p>

Workstream 3: Effectively supporting the Parole Process			
Lead	Executive Director for Wales and Public Protection		
Overview	<p>To work with stakeholders to identify where the parole process could be improved and to identify a programme of activity to make these areas more efficient.</p> <p>The aim for this workstream is to reduce unnecessary delays in the process and ensure hearings are properly informed by timely, good quality reports and evidence.</p>		
Actions			
Action	Summary	Deadline	
<p>(1) Conclude the Psychology parole pilot and take a decision on wider roll-out.</p> <p>This pilot seeks to ensure Psychology reports are prepared consistently in all cases where it is identified as beneficial to the parole review and in good time for the Parole Board.</p>	<ul style="list-style-type: none"> Produce an evaluation report to include recommended approach to business as usual Recommendations and evaluation to be considered by senior leads and signed off. 	<p>End May 2023</p> <p>End June 2023</p>	
<p>(2) Complete the Mental Health streamlining pilot and take decision on wider roll-out.</p> <p>This pilot seeks to reduce the time gap between a Mental Health Tribunal decision to discharge, and a Parole Board hearing taking place.</p>	<ul style="list-style-type: none"> Produce an updated timetable for the key milestones within the pilot Produce an evaluation report to include recommendations for business as usual 	<p>End April 2023</p> <p>End October 2023</p>	
<p>(3) Complete a time-bound review of current challenges in delivering effective parole process.</p>	<ul style="list-style-type: none"> Set-up a Working Group to provide the first IPP Progression Board with a specific set of actions to drive improvements in the parole process and practice. This work must take account of the Government audit of Parole Dossier quality (all sentence types), for which a separate action plan is being developed. 	<p>End June 2023</p>	

Workstream 4: Progression initiatives, innovation, and resettlement		
Lead	Chief Psychologist Deputy Director Reducing Reoffending	
Overview	<p>To identify gaps in the current provision for those serving IPP sentences and subsequently develop, deliver, and manage emerging progressive interventions and initiatives to address these gaps, as well as continue and improve delivery of current initiatives already in place. The Psychology Services Group (PSG) IPP Strategy will form a significant part of this work stream, however it will also include a focus on the period prior to and immediately following a prospective release decision, and how the HMPPS resettlement strategy can best support those who don't know they will be released until very close to the date they will be.</p> <p>This work will be underpinned by previous, current and future research on IPP and related cohorts.</p>	
Actions		
Action	Summary	Deadline
(1) Psychology activity needs analysis and research review by PSG (Psychology Services Group)	<ul style="list-style-type: none"> • Deliver a needs analysis of the never-released IPP population using a stratified approach <ul style="list-style-type: none"> ○ All unreleased cases 5+ years past their minimum tariff ○ All IPPs, irrespective of tariff status, with index offences in categories other than 'Violence Against the Person' or 'sexual' index offences, or robbery • Develop specific actions, with deadlines, to ensure the identified needs from the completed analysis are met and are captured within the IPP action plan. • Ensure up-to-date research and literature is considered so that all recommendations and action points are in line with best, evidence-based practice. • Provide a series of development events for Psychology staff and stakeholders on research outcomes relating to IPP. • Deliver a needs analysis of the recalled IPP population using a stratified approach. 	<p>July 2023</p> <p>September 2023</p> <p>October 2023</p> <p>December 2023</p> <p>March 2024</p>

(2)	Offender Personality Disorder (OPD)-related IPP-focused activity by Joint HMPPS and NHS OPD Pathway Team.	<ul style="list-style-type: none"> • Ensure IPP offenders who screen into the OPD Pathway are considered within the refreshed OPD Pathway five-year strategy, which will be published by NHS England, expected by June 2023. • Conduct a review of OPD resource allocation within the prison estate in light of the changing population in open prisons. • Develop an action plan, in partnership with the Public Protection Group, to set out how the OPD Pathway can better engage with the IPP population, and appropriately prioritise access to services. 	<p>March 2024</p> <p>June 2023</p> <p>March 2024</p>
(3)	Support progression-focused prison wing developments	<ul style="list-style-type: none"> • Identify prison regimes/wings which have a specific focus on progression, and review the criteria for accessing these with a view to enabling access for IPP prisoners where appropriate 	Dec 2023
(4)	Refresh and deliver the Psychology IPP Strategy (PSG lead)	<ul style="list-style-type: none"> • Complete and collate case reviews, monitoring and RAG rating on all never released IPP prisoners to feed into IPP progression panels. • Refresh the PSG IPP strategy in line with the national approach • To provide an event for PSG and contracted Prison psychology on the refreshed PSG IPP strategy. • Regional Psychology IPP leads to provide an event to the Senior Leadership Forums to raise awareness/share practice on IPP progression. 	<p>March 2024</p> <p>June 2023</p> <p>September 2023</p> <p>December 2023</p>
(5)	Develop and deliver an IPP-specific strand in the HMPPS Resettlement Strategy by Probation Service	<ul style="list-style-type: none"> • IPP prisoners to be able to access the resources and investments in prisons to support improved employment outcomes, including the Employment Hubs, Prison Employment Leads, ID and Banking Services and DWP Work Coaches. • We will consider as part of our review of resettlement services and Commissioned Rehabilitation Services the specific needs of IPP offenders to help them prepare for release and access support post release. 	<p>April 2023</p> <p>April 2024</p>

(6)	Respond to the needs of IPP offenders with innovative and bespoke services by PSG, Health and OPD pathway Leads.	<ul style="list-style-type: none"> • An improved plan of how specialist assessments, if these are identified as barriers to progression, can be effectively facilitated. • An improved plan of how bespoke individual interventions can be facilitated in cases where standardised interventions are not appropriate, 	December 2023 March 2024
(7)	Improve sharing of communication of progression opportunities for IPP offenders	<ul style="list-style-type: none"> • Ensure a directory of progression opportunities is developed and available for OMU staff and other parties; to include but not be restricted to: <ul style="list-style-type: none"> ○ OBP provision ○ Residential wings 	April 2024
(8)	Identify how we can continue to support IPP prisoners at risk of self-harm, suicide and violence safely in custody whilst supporting their engagement and progression.	<ul style="list-style-type: none"> • Produce a learning bulletin sharing learning from recent self-inflicted deaths of IPP prisoners. • Identify regional approaches to supporting and managing IPP prisoners. • Assess the risks of self-harm, suicide and violence amongst the IPP population and what the drivers and triggers are for these behaviours and if these are heightened within this cohort. • Identify the propensity for IPP prisoners to be held in segregation and identified as isolated individuals, and the impact this has on their engagement with purposeful activity. • Identify what peer support models are available or could developed for IPP prisoners. • Produce IPP safety guidance for staff, including sharing any promising practice, to increase understanding of risks posed by IPP prisoners and how they can support. 	April 2023 All September 2023
(9)	Improve the way the Approved Premises Estate can respond to the needs of IPPs, and better enable them to successfully access and progress through an AP placement.	<ul style="list-style-type: none"> • Implement the digitised referral process for our Approved Premises and develop a more streamlined Central Referral Unit to enable better assessment of the referrals that we received, and more effective use of the capacity that we have in our AP • Ensure that IPP referrals are assessed as per our eligibility criteria which ensure that AP are used to manage those people who present the highest levels of risk or complexity • If IPPs are received as an emergency referral, ensure that decisions to release are communicated directly so that we can assess as swiftly as possible. 	All March 2024

		<ul style="list-style-type: none">• Maintain our commitment to ensuring those screened into the PD Pathway or those on Progression Units in custody are encouraged to apply for appropriate PIPE placements• Commence delivery of improved mental health provision for our AP informed by learnings from our review in 22/23.• Implement the Residence plan for all AP residents, which will focus on the individual needs of each person to support their time in AP and increase focus on rehabilitation	
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Workstream 5: Population, Performance Monitoring and Data Publication

Lead	Executive Director, Strategy, Planning and Performance Chief Data Officer, Data and Analysis
Overview	<p>This workstream covers two key areas. The first is ensuring we have sound data and metrics, and mechanisms to use to effectively track performance across our practice in delivering the IPP action plan and case progression. The “exam question” is: How well does HMPPS support the progression of those serving IPP sentences towards a safe and sustainable release?</p> <p>The second area aims to identify what data we can build into the formal Offender Management Statistics quarterly publications. This is to meet our commitment to improve transparency in regards IPP progression.</p>

Actions

Action	Summary	Deadline
(1) Design and implement an IPP performance report for operational use to oversee progression and for central use to track performance.	<p>This report will convert the statistics available on the IPP population into a performance tracking document, highlighting trends and comparisons.</p> <ul style="list-style-type: none"> Review the IPP dashboard to ensure any further data is built into it to maximise the statistical information that can be used to track the population; Identify any existing formal performance targets/metrics where the IPP specific figures could be extracted for use; Develop a working draft of a performance report based on available data. 	First iteration of the new performance report by September 2023
(2) Identify and deliver the data assurance for new IPP population information that can be routinely published in the quarterly Offender Management Statistics bulletins	<p>Work with Analytical Services Directorate (ASD) to set-up the regular publication of new data on IPP, including community IPP population, time before recall, outcome of IPP Licence Termination referrals.</p> <ul style="list-style-type: none"> Agree which new IPP data to be published, including processes for quality assurance with lead analysts. Publish new data in quarterly Offender Management Statistics bulletin, to include: <ul style="list-style-type: none"> IPP community on licence & secure hospital population; Eligibility, referral and completion data for IPP licence termination; Eligibility, referral and completion data for suspension of supervision. 	First new data published by January 2024

(3)	Set out the structure for an Annual Report on progress against the action plan and publish the first report.	<ul style="list-style-type: none">• Produce the format for the required publication of an annual report, clarifying what will be covered and how.• Draft the first report ahead of formal publication, for sign-off by the Senior IPP Progression Board.	First report due March 2024
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Workstream 6: Accountability for Delivery			
Lead	Executive Director for Wales and Public Protection		
Overview	This workstream will ensure that the delivery of the action plan is enabled through clear ownership and accountability. Each workstream must sit within a governance structure and the workstream leads are accountable at a designated senior level. This would be operational and central senior level accountability. Central to this will be the introduction of a new Senior IPP Progression Board, responsible for overseeing the delivery of the IPP Action Plan (central and operational).		
Actions			
Action	Summary		Deadline
(1)	Produce an initial commission for operational IPP oversight ahead of a formal action plan commission when HMPPS moves towards a new operational structure later in 2023.	<ul style="list-style-type: none"> Draft an interim commission for all Prison Group Directors (PGDs) and Regional Probation Directors (RPDs) to oversee and track the IPP population through the Senior Leadership Forums in their areas. 	End May 2023
(2)	Set up central Senior IPP Progression Board	<ul style="list-style-type: none"> Formalise terms of reference, a standing agenda, membership of the Board and a secretariat function. To track/oversee progress centrally and take decisions on the future ambition of the IPP Action Plan and objectives. 	End June 2023 (first Board meeting)
(3)	Set up external stakeholder reference group	<ul style="list-style-type: none"> To discuss IPP progression and consult on plans. Produce Terms of Reference (ToR) and a standing agenda for a twice annual external stakeholder reference group and obtain formal sign off from the IPP Progression Board. Convene the first IPP Progression Reference Group to include key external stakeholder such as the Prison Reform Trust, UNGRIPP, HMI Probation/Prisons 	End June 2023 (ToR and membership) Sept 2023 (First stakeholder meeting)
(4)	Develop the required documents that HMPPS Areas will use to produce their IPP Action Plans	<ul style="list-style-type: none"> As HMPPS moves towards a new structure later in 2023, this action will ensure a package of supporting information and templates will be available to each operational area, so they can develop their operational IPP Action Plans, informed by this central plan. 	End October 2023