Making Probation work

Andrew Bridges October 2014

[This article is based on the presentation I gave at the Royal Society for the Arts on 22 October 2014 for the University of Southampton on 'The Future of Probation' at their Institute for Criminal Justice Research seminar.]

Instead of a prediction about what the future might or might not bring for Probation this is an immodest prescription for a potentially successful future that Probation should still be able to have. Despite the Becher's Brook sized hurdles that Probation has been facing recently, and will continue to face, I call my prescription Making Probation Work.

We need to be sober about the difficult path ahead, but we can still be positive and determined in our approach to it, which is realistic if we are clear about what we want to achieve. It is consistent with the advice I gave in New Zealand, described in a previous article in EuroVista 2.1.

In fairness, it's not easy for people working in the Probation world to be optimistic when you're trying to get your day to day Probation job done at a time of constant upheaval and rebranding, capped by the most recklessly gung-ho reorganisation that Probation has ever faced. The Transforming Rehabilitation (TR) programme is indeed fraught with potential risks, plunged into boldly when the current Justice Secretary decided to forgo the pilot projects planned by his predecessor, so in this context it's not exactly easy to feel optimistic.

Indeed, if I'd been asked at the planning stage whether I thought that the TR programme was a good idea I'd have had to say No, as it clearly sets out to change much too much much too quickly. But once it became the policy of our constitutionally elected Government, I – and everyone else involved– had a choice to make.

One option is to snipe from the sidelines, as many commentators do, saying loudly "I wouldn't start from here", and then walk away, while another option is to try to help make it work – or at least offer to do so – hence my offered prescription. For I have little patience with the ideological position-taking approach to discussing public services, when many people decide that being state-run is unequivocally a good thing, and privately-run a bad thing, or vice-versa.

It's effectiveness that I'm interested in, and in my experience none of the different forms of ownership have a monopoly on either success or failure. You <u>can</u> do a good job whether you are a public or a private organisation, and I've been happy to assist either type of organisation to try to do a quality job, and I still am.

Under the TR Programme it will be harder to do this than it should be, which is why I say we have to be sober in our plans. But I think it can be done, which is why I also say that our approach should be optimistic.

What are my grounds for my belief in sober optimism?

First, I have a belief in Improvement, and also that with rare exceptions it does not require a budget increase to achieve this.

Second, although I have a strong emotional attachment to public service, and its virtues when it is at its best, I know that it can have its drawbacks, particularly when it has no competition. Meanwhile, although private companies can sometimes behave pretty badly, they are also capable of performing very well.

And third, new organisations can sometimes have the creativity and flexibility to devise new ways to do the work better. (To this end I am particularly interested to see whether 'staff mutuals', among others, are to get the opportunity to prove themselves successful in the Probation world.)

But, what could still be achieved, given that, with TR so badly conceived, we are now "Starting from here"?

I'll start by commenting that: Management generally, like Probation practice generally, is almost always over-complicated by the people who talk about it. So a key principle for participants is to avoid these over-complications, and to establish and maintain Focus, and not become distracted by the fascinating scenery all around you.

If you're leading an organisation delivering a service you need to focus very sharply on planning both the deployment of your Resources, and your intended Achievements, as integrated components within one single business plan – in order to achieve the Best You Can with What You've Got - or the most bangs for the least bucks, if you prefer.

But in the Probation world it's often proved difficult to define what counts as a 'bang' –of Achievement– in operational terms, which has led at different times to *both* over-complication *and* over-simplification – and furthermore people have rarely found it easy to decide how to deploy their bucks.

Yet you *can* do both, to which end I am offering some prescribed Keywords. First I mention Absorption, the method for the task of Allocating and managing Resources, and then the Keywords of Define, Desire, Design and Equip for the task of Planning Achievement.

So first we go to the task of allocating and managing your Resources.

Of course in the future Probation world your total available resources – the size of your 'cake' – is likely to be determined by the winning bid you made, whether as a private company or hopefully in some cases a 'mutual', and to win your bid the size of your cake is not likely to be great. So it's essential that you have a method of dividing up that cake – to deploy your available resources – as effectively as possible, the principal resource in a service such as Probation being the time to be spent by staff on various tasks with each individual case.

On the rare occasions in the past when someone has made a serious attempt to devise a system for doing this, the approach has usually had two major drawbacks: First, it has often focused on describing what's been happening instead of what needs to be happening, and second, it has almost always used the so-called 'true' costings method, where its excessive detail and spurious exactness of measurement has made it unworkable to use in managing operational practice.

But, despite that, seriously your way forward is still to do a spreadsheet, but make sure that:

1) It projects deployable staff time towards not necessarily how they have spent their time in the past, but instead towards what you *want them to achieve* with your expected workload of the projected tasks that you plan to need doing, and

2) - to do this, instead of using the so-called 'true costings' method, you use the Absorption method instead.

This is a huge and detailed topic, which I don't cover further in this article, but the important thing to note at this stage is that the headline projections that emerge from such an exercise prove sobering:

Each of your staff who manages cases will have on average between just *20 to 30 hours* to devote to the *whole* of the *first year* of supervision of each case they have, with fewer hours in subsequent years of supervision – that's for face-to-face time *plus* all other supporting activities in managing each of those cases.

What can actually be achieved with such tight resourcing? – we move onto the second task, the planning of Achievement.

This is where we go with the other four keywords of Define, Desire, Design and Equip, starting with the job of Defining what we are aiming to achieve. This should be obvious, but it's trickier than it looks at first, though solvable.

Everyone knows that this Government is, for good reasons, keen on payment by results, and rightly it wants to see reduced reconvictions nationally, though I note that the method of measuring this still varies. Accordingly each provider company, i.e. 'Community Rehabilitation Company' (CRC), will want to achieve this, but alongside this will also need to minimise reputational risks to itself – these are the *strategic outcomes* that need to be achieved both nationwide and by each CRC.

But these won't work as objectives for your staff to work to day by day, and instead you need to set *operational outcomes*, which if achieved will together lead to the strategic outcomes you seek. To set these operational outcomes you need to Define for your staff not only *what you want them to achieve* day by day, but also *how it will be demonstrated*, as an integral part of the same exercise.

To this end, I say that you should brief each practitioner that you want her or him to achieve *Three Purposes* of Probation supervision with each of the cases they manage:

- Purpose One: To make the person under supervision *less likely to reoffend*, which they achieve by setting in motion *constructive interventions*,

- Purpose Three (bear with me here![1]): To minimise that individual's *Risk of Harm to others*, which they achieve by organising *restrictive interventions*, and

- Purpose Two: To implement the sentence of the Court, or the Licence, which they achieve by taking actions to promote the individual's Compliance with its requirements, and/or to take Enforcement action if they don't.

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[1] This sequence here highlights the contrast between *constructive* and *restrictive interventions*.

Each of these Purposes are separate, but they also overlap as is shown in the graphic accompanying this article - both things are true. Furthermore, they each must have a definition of not only *what has to be achieved*, but also *how it will be demonstrated* and thereby *measured.*

The topic of *how it will be demonstrated and measured* is a subject in itself that I will return to in an Annex to this paper, but at this stage the points to be emphasised are:

1) That each practitioner has to do *all that they reasonably can* to achieve *all of these Three Purposes with each case* within the available time and resources, and

2) Not only can this be understood and worked to by each practitioner day by day, but also it can be measured and monitored and managed by senior personnel quarter by quarter.

If followed through properly this approach can therefore be adhered to consistently right through the organisation, like the lettering through a traditional stick of rock – or simply a 'shared understanding' if you prefer.

But from Define we now need to look at Desire.

I hope it's obvious that in a personal service like Probation you need all your staff – not just the practitioners – to Desire both to achieve those Three Purposes as defined, and to demonstrate that achievement. Since every individual under supervision is unique you need each practitioner to be motivated to *use their discretion in a skilful and focused way* in order to achieve those operational outcomes – in other words you need them to have a good *attitude* as well as a good *aptitude* – which is why I call this Desire.

Management can promote this by 'megaphone management' – which I don't recommend! – or you can find ways of taking people with you. This is something that you can nurture by a combination of all the various behaviours exercised by you and your managers at every level in your organisation: Being clear and consistent about what you want practitioners to achieve, as shown earlier, is an essential first step (but one that is in itself rarely attained in my view), but even then it is it is the follow-through, with all your other behaviours, that convinces staff that you really do care about doing a quality job and benefiting society – and this is what draws staff into *wanting to achieve* what you want them to achieve.

And to support that Desire your organisation also needs to have the right Design.

Design is about designing the *work processes*, and organising the staffing and other resources - staffing being the key consideration - in order to bring about the planned Achievements, and in this short space I'll touch on just four aspects of this.

First, you need to design the work process to integrate the 'Doing' with the 'Demonstrating' – the entries staff make on case records must also function as performance data, without the need for them to make further entries on a separate performance database, if you design it right.

Second, you should ensure that all practitioners grasp an unequivocal foundation principle that comes in two parts:

1) WHAT is to be achieved is Prescribed by the organisation, while

2) HOW it is to be achieved is Advised by the organisation.

In any organisation your best staff will respond best to the idea of being told *what they've got to achieve*, but invited to use their own initiative, with support, in *how they go about achieving it*, doing the Right Thing with the Right individual in the Right Way at the Right time, to promote the Desistance journey required of each individual under supervision.

Third, as you may have gathered already, I believe that you should call all staff who manage cases 'Probation Practitioners' whether they are technically Probation Officers or Probation Service Officers – because although some will necessarily be more skilled and experienced than others they should be seen as part of a single spectrum of conscientious practitioners rather than the current vestige of a divisive two-tier structure.

Linked to this is my final point here, that you should organise your Probation Practitioners so that no longer is the job of managing cases regarded as the role that most of them want to get away from, but instead is seen as the 'top' role for practitioners, the job that practitioners *aspire to attain*.

But to pursue further the need to integrate Doing with Demonstrating, we move on to the fourth keyword of Equip.

Yet Equipping the staff with the Tools they need to do the job has, as with at least two of the previous keywords as well, been in effect neglected in England and Wales over the last 20 years – though I don't mean neglected by lack of effort or resources, I mean neglected by a failure to deliver.

Equipping obviously includes office premises, transport and other facilities that promote doing the job well, but I'm focusing this minute on the need for an ICT (Information and Communications Technology) system that supports the Design of your work process by integrating case management with performance measurement on a single system. Without this your staff will continue to need to enter case information twice - not only an obvious inefficiency but also an irritating burden for the practitioner, that in turn weakens her or his Desire to own what the organisation wishes to achieve.

The failure to deliver the NOMS Information system as originally conceived has meant, despite the gallant substitute systems adopted since then, that both practitioners and managers will continue to be handicapped for some time to come by this and by the other limitations of their case management systems – we will have to treat that as a fact of life for now.

My key point here is that you need a system of ICT that efficiently and effectively actually supports the integration of the *carrying out of the job* with the *recording of it for accountability and performance measurement purposes* – as designed into the work process.

So to summarise planning for Achievement:

I have included two slides to the right just here to emphasise that it's not good enough only to do bits of the four keywords I've been employing, or to use them piecemeal, or to do some now and some for later, because they are interdependent and it is absolutely necessary to organise them as a single overall integrated and coherent approach to planning to Achieve.

Having summarised planning for Achievement I now offer a summary of my overall prescription on two further slides below.
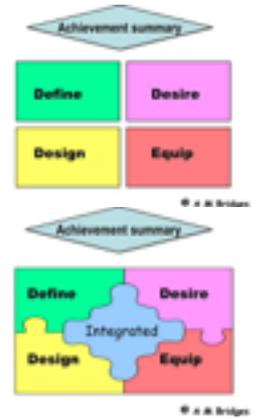
The first speaks for itself, a checklist of action points.

The second is a rather busy graphic, which I hope captures my lean and focused approach to delivering or indeed inspecting Probation work, consistent with how I've worked in practice over the last 15 years or so.

I'm not keen on the TR Programme, especially the fallacious division between so-called "High Risk" cases and the rest, but ironically it does provide an opportunity to make a virtue of scarce resources and develop something lean, focused – and perhaps demonstrably effective.

That's why I'm not able to predict a successful future for Probation, but I can offer this prescription of how – despite all the current difficulties – a *successful future for Probation* might yet still be achieved.

The Achievement & Resourcing Focus:

- Clarify precisely where you want to get to – achievement of operational outcomes (Define – the Three Purposes):
  Is it clear and specific both about what has to be achieved and how it is demonstrated?
- Get your people to want to achieve and demonstrate this (Desire):
  By megaphone? Or by 'taking people with you'?
- Ensure that the work process enables everyone involved to demonstrate achievement of operational outcomes (Design):
  Does the process integrate 'Doing' with 'Demonstrating'?
  Does everyone know their contribution?
- Provide your people with the tools they need to do this (Equip):
  Or at least 'sufficient' interim tools?
- - and have you seriously costed the whole exercise, using the Absorption method?

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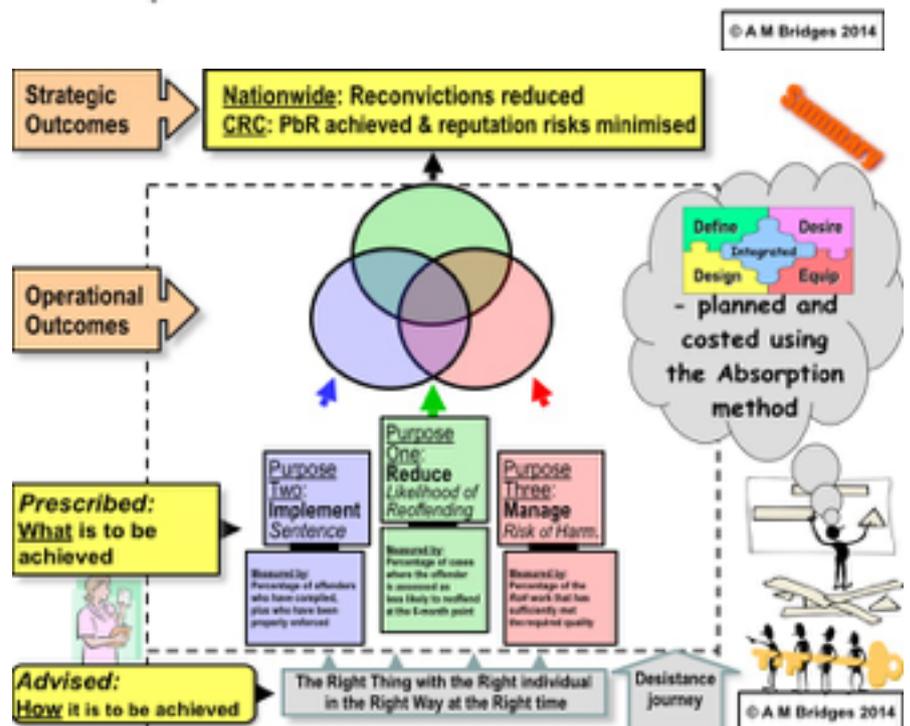
[The Annex that follows picks up on some of the points that could not be explored further in the original 20-minute presentation.]

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Annex - points for additional coverage:

1. Desistance Journey:

In terms of the specific work to reduce likelihood of reoffending (LoR) the approach I am advocating is entirely consistent with the concept of the 'desistance journey'. The works of McNeil, Weaver, Farrall and Maruna have focused on understanding the offender in the context of their particular environment and have shown that it is not helpful to think of work to reduce reoffending as a matter of administering 'treatment' to 'cure' dysfunctional offenders. Instead each individual who has offended makes their own desistance journey – he or she is an active participant in shaping as well as being shaped by every experience that comes along. Practitioners should therefore be asked to deploy interventions (within the wider 'engagement process') as *activities that promote and aid the desistance journeys* being made by each individual under supervision.

2. Measuring achievement of the Three Purposes:

I have emphasised the important of having Operational Outcomes that are distinct from the desired Strategic Outcomes, although the Operational ones should clearly help to lead to towards the Strategic ones. With Operational Outcomes the practitioner can see for herself or himself whether or not they are being achieved with each case while the case is still current, and managers can aggregate results into a quantitative format for monthly or quarterly management purposes.

In particular, the Strategic Outcome of *reduced reconvictions* is, first, a metric fraught with difficulties of what to count and how and when to count them, issues that have been discussed frequently by other writers elsewhere. Second, the feedback of the 'result' - i.e. the individual either has or has not been reconvicted in 'x' period of months/years - inevitably arrives a long time after the event. It becomes retrospective information, essential for measuring progress nationally over a period of years, but useless for companies and/or the National Probation Service for managing their service month by month.

However, because working with individuals who have offended, as a personal service, is essentially a qualitative process, there is necessarily a qualitative element to a greater or lesser extent in the measurement of the achievement of each of the Three Purposes. Attempts to identify outcomes that do not have a qualitative element are deluded, and so we should therefore be honest about the qualitative elements, aim to benchmark such judgements as best we can, and then make sure that the methods we have chosen are capable of being both recorded and aggregated quantitatively. This is what my prescribed approach aims to achieve, and is consistent with the methodology of the last area inspection programmes I managed when I was Chief Inspector.

2.1. Purpose One: Reduce Likelihood of Reoffending (LoR):

Measure: Percentage of cases where the offender is assessed as being less likely to reoffend at the six-month point

Note 1: For the reasons explained above, this measures any changes in *Likelihood of Reoffending during the period of supervision*, rather than changes in convictions recorded some time after the period of supervision, but of course if achieved it should lead towards reduced reconvictions in the longer term.

Note 2: In principle this is about measuring something at the start of supervision, and then measuring it again at a subsequent later point in time, which I have selected to be the six-month point. It is a measure of *'distance travelled'* by the individual (towards desistance), rather than a measure of *'absolute achievement'* of 'absolute' desistance.

Note 3: The six-month point is an arbitrary period. I prefer six months as most work is done inside the first six months, and if it is not or it is proving unsuccessful this gives time for the practitioner to change the plan. An ambitious organisation could measure again at the twelve-month point and/or at the end of supervision, but the practical and organisational difficulties involved lead me to recommend that if attempted these should be additional to the six-month point and not instead of it.

Note 4: In my experience there are broadly two feasible methods for measuring whether each individual under supervision has become less likely to reoffend. They are separate, but in principle they do not conflict, and therefore it is possible for a CRC, or the National Probation Service as a whole, to use one or the other - or both - of the methods. Over time it may prove possible to see whether one is more reliable than the other in terms of predicting eventual success in terms of the Strategic Outcome of reduced reconnections but that is not essential. The importance of these two methods is that for operational purposes they are good enough to work in practice.

The two possible methods for measuring reduced Likelihood of Reoffending are:

Method A: At the start of supervision the practitioner will record on the CMS (case management system) a numerical score that rates the offender's Likelihood of Reoffending, using either OASys or any successor system. At the six-month point, and ideally also at the end of supervision, the practitioner will record on the CMS revised scores based on reviews conducted at those points. This data can be extracted and analysed to indicate what proportions of cases have either become *less likely*, or *no less likely*, or *more likely* to reoffend.

Method B: At the start of supervision it will have been recorded on OASys (or its successor) the factors that make this individual more likely to reoffend, and with which of these factors planned work is to be undertaken. At the six-month point,

and ideally also at the end of supervision, the practitioner will record on the CMS the achievement of any one or more interim *'Outcomes that make this individual now less likely to reoffend'*. The best way of facilitating this is to provide the practitioner with a list of some of the chief potential outcomes - such as 'Person is now in employment' - though this should not be a closed list. Analysis of the data recorded will show in aggregated form the proportion of cases where such interim outcomes have been achieved, and also how many and in relation to which factors.

One or both of these methods should be designed into the case management system, so that entering the data becomes an integral part of the process of everyday case recording, provided that the initial assessment, a six-month review and a final review are all undertaken with each case as part of the normal process of giving account of the work done.

The data entry is necessarily based on qualitative judgements by the practitioner, and of course these judgements have to be made honestly. There must be no material incentives to individuals to inflate scores or achievements because some practitioners will have 'easier' cases than some others. The object of the exercise is to enable a clear focus on what the organisation trying to achieve, and to promote shared learning over time about what enables it to achieve its Strategic Outcome of reducing reconvictions.

I will add that, on a practical point, both of these Methods are difficult to deploy logistically, but Method B is less difficult, and a version of it was successfully deployed in Berkshire from 1999-2001.

2.2. Purpose Two: Implement the Sentence (or Licence):

Measure: Percentage of offenders who have Complied, plus those who have been properly Enforced

Note 1: This measure is about whether the individual under supervision has been held to account for serving their sentence (or Licence) in the community, as a Purpose in its own right. Whether or not the person reoffends, if the practitioner fails to Implement the Sentence imposed this creates a potential reputational risk to the organisation - "They are not doing their job properly!"

Note 2: There are two elements to this: Compliance and Enforcement. Compliance is the practitioner arranging appointments, and the individual under supervision keeping those appointments, and this also includes any additional work that may need to be done by the practitioner to 'promote' Compliance - such as chasing up by calls, texts, visits and frank discussions. Enforcement is specifically the formal sanctions taken when needed following failed appointments.

In principle, in every case either the offender complies satisfactorily with the set requirements, or, if the offender does not comply, the practitioner enforces properly: the percentage of cases that meets one or the other of those two requirements needs to total as near to 100% as possible.

Note 3: In practice, a number of qualitative judgements have to be made to determine what 'counts' as complying satisfactorily, or enforcing properly, especially now that formal National Standards for them no longer exist in England and Wales. Moreover, the reality of managing some cases can be extremely messy, as some individuals report late, or on the wrong day, or produce sick certificates after a long delay, or give rise to any number of complicated circumstances. Therefore, there will need to be data entries on the CMS of *appointments arranged, appointments kept*, and *appointments failed* (including '*acceptable* failure' and '*unacceptable* failure'), plus *warning letter sent, Court action started* and *Court results*, as part of the normal process of giving account of the work done. However this does not mean that any simple numerical calculation can be made in order to measure achievement of this Purpose.

Instead a series of qualitative judgements has to be made, informed by the data entered above. The judgements are:

1. Were sufficient appointments arranged?

2. Were sufficient appointments kept?

3. Where sufficient appointments were NOT kept, was Enforcement action sufficient?

The point of the questions is to identify whether or not the Court sentence (or Licence) has been implemented properly. In principle, there should be a YES to (1) and (2), and where (2) is a NO there should be a YES to (3) - the YESs for (2) and (3) should add up to 100% in any sample reviewed, to achieve a 'perfect' result.

In practice this requires a whole series of qualitative judgements about what it was reasonable to expect the practitioner, or the wider organisation, to do in response to a whole range of complex possible events. - and since the abolition of the formal National Standards on frequency of appointments and promptness of enforcement action even these now each require a qualitative judgement.

However, the critical test for each of these questions in any particular case should be whether the actions taken or untaken could be credibly defended should the case come into the public eye. This question of risk to the reputation of the organisation is a key theme that is common to Purposes Two and Three.

2.3. Purpose Three: Manage RoH (Risk of Harm to others)

Measure: Percentage of the RoH work that has sufficiently met the required quality

Note1: 'RoH' always means *Risk of Harm to others* - see Glossary further below.

Note 2: Although there is some overlap between them, as shown in the earlier graphic, Purposes One and Three are quite distinct, a point that most academics unhelpfully fail to understand. These two Purposes are achieved by different means - *Constructive* as distinct from *Restrictive* Interventions (see Glossary again) - and they are measured by different means.

Note 3: But in common with Purpose Two a key theme is whether actions taken or untaken could be credibly defended should the case come into the public eye - did the relevant people 'do their job properly'? But whereas the reputational risk after a failing on Purpose Two is real but not disastrous, the reputational risk following a failure on Purpose Three can be catastrophic both to the organisation and to one or more of its senior staff.

Note 4: The Purpose Three risk to the reputation of the organisation is when someone under current supervision commits (or is accused of committing) a serious or notorious offence, most notably involving serious harm or the apparent threat of it to another person, especially a child. The problem is that the risk of such an event happening cannot be eliminated altogether, but it is reasonable for the public to expect organisations to 'do their job properly' - and through the media the public is frequently very unforgiving when this is seen not to happen.

Note 5: With Purpose Three the specific criterion concerning whether or not 'the job was done properly' with each case has to be whether 'All reasonable action was taken in this case to keep to a minimum this individual's Risk of Harm to others (RoH)'. As always this has to be decided by a series of qualitative judgements, which have to benchmarked, especially around the question of what it is *reasonable* to expect in terms of action that should be taken at any particular point in a case.

Note 6: Therefore, to assist practitioners and managers working with current cases to assess for themselves whether their work would stand up to public scrutiny should a catastrophe strike, from 2007-11 HM Inspectorate of Probation devised and made publicly available inspection tools and guidance to enable this. We also trained some staff from each area in our methodology and thinking during that period.

Note 7: That final methodology, which aggregated qualitative judgements into quantitative scores and was deployed from 2008-11, was therefore the outcome of

about 15 years' development in thinking and practice by me and others. We were able to assess how often RoH work was being done well enough.

That methodology can still be deployed by managers within CRCs or the NPS if they choose to do so, in amended form if necessary, provided that the core principles are adhered to - and it is what I prescribe if an organisation is to reduce its own exposure to potentially catastrophic reputational risk.

Note 8: It is a mistake to think that RoH work is not needed by CRCs, based on the assumption that 'High Risk' cases are being retained by the NPS. Over three-quarters of 'Serious Further Offending (SFO)' cases involve individuals that were assessed (usually correctly) as not being 'High Risk'. There is a certain amount of RoH work - assessments, reviews and usually some management as well - to be done with lower RoH cases, although less in quantity than with High RoH cases.

3. Glossary of terminology used:

This Annex has condensed many years of thought, planning and action by me and others - each point, and even each term, could be expanded into an article in itself. For example I am still able to show that the Three Purposes have their direct counterparts in the onetime language of NOMS (National Offender Management Service) of "Punish" (Purpose Two), "Help" & "Change" (Purpose One) and "Control" (Purpose Three).

I therefore reproduce here some of the other key terms from the Glossary printed in most reports of HM Inspectorate of Probation from 2008-11, since they provide some of the building blocks of my prescribed approach.

Constructive and *Restrictive* interventions: A *constructive intervention* [by a practitioner] is where the primary purpose is to reduce *Likelihood of Reoffending*. In the language of offender management this is work to achieve the 'help' and 'change' purposes, as distinct from the 'control' purpose. A *restrictive intervention* is where the primary purpose is to keep to a minimum the offender's *Risk of Harm to others*. In the language of offender management this is work to achieve the 'control' purpose as distinct from the 'help' and 'change' purposes.

Example: With a sex offender, a *constructive intervention* might be to put them through an accredited sex offender programme; a *restrictive intervention* (to minimise their RoH) might be to monitor regularly and meticulously their accommodation, employment and the places they frequent, whilst imposing and enforcing clear restrictions as appropriate to each case. NB Both types of intervention are important.

Risk of Harm to others (RoH): As distinct from *Likelihood of Reoffending*: If an offender has a medium or higher *RoH* it means that there is some probability that they may behave in a manner that causes physical or psychological harm (or real fear of it) to others.. The offender's *RoH* can be kept to a minimum by means of *restrictive interventions*.

'RoH work' is the term generally used by HMI Probation to describe work to protect the public. In the language of offender management this is the work done to achieve the 'control' purpose with the [practitioner] using primarily *restrictive interventions* to keep to a minimum the offender's opportunity to behave in a way that is a *Risk of Harm to others*. HMI Probation uses the abbreviation '*RoH*' to mean specifically *Risk of Harm to others* [i.e. not harm to self]. … The intention in [saying "Harm" and not "Serious Harm"] is to help clarify the distinction between the probability of the event occurring and the impact/severity of the event….

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