



Local Policing Structure

For Decision

Please ensure ALL sections of this report are fully completed after discussing with the subject expert and a version control included.

Meeting name:	Constabulary Governance Board
Date of meeting:	Tuesday, 20 February 2024
Title of paper:	Local Policing Structure
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Sponsor/ Board member:	ACC 255399 Donna LAWTON

Executive summary:

This paper seeks to cover five areas, all of which have been previously discussed at CGB on 14th December 2023 and 16th January 2024. Those areas are:

- (1) An uplift of Inspectors within Criminal Justice to ensure self-sufficiency in relation to PACE cover.
- (2) An uplift of Sergeants within Criminal Justice to support increased prisoner demand.
- (3) An uplift of Chief Inspectors to provide the capacity for an 'on duty' Chief Inspector / Silver on a 24/7 basis within the Constabulary (see appendix A for draft role profile).
- (4) The realignment of Vanguard resources to Divisional Commanders / Crime Command providing local, proactive capability.
- (5) The realignment of TAU resources to Divisional Response Teams, providing a holistic Student Constable tutoring experience. This does not impact on the Assessment Unit.

Following feedback given in relation to a number of options and contingencies linked to these areas which have already been debated, this paper provides focus on proposals where further detail has been requested in order that a decision can be reached. There has been wide-ranging consultation and engagement, over several months, which contributes to the detail provided.

Recommendation(s):

CGB is asked to support the following recommendation(s):

- (1) The centralised TAU function currently in place is collapsed, with TAU resources returning to divisional response teams.
 - (1a)** The TAU Inspector post is realigned elsewhere within the organisation
 - (1b)** Five TAU Sergeant posts are realigned elsewhere within the organisation
 - (1c)** The Assessment Unit remains in place under the leadership of Learning and Development
- (2) The centralised Vanguard function currently in place is collapsed, with Vanguard resources returned to Divisional Superintendents / Crime Command
 - (2a)** The Vanguard Inspector post is realigned elsewhere in the organisation
 - (2b)** Vanguard teams are re-branded as Neighbourhood / Crime Taskforce Teams
- (3) The Criminal Justice Department is uplifted by 4 Inspectors and 5 Sergeants.
- (4) The conversion of the Force’s FIM role from Inspector rank to Chief Inspector rank, trained as TFCs, to provide 24/7 ‘on duty’ coverage for the Constabulary in a Force Duty Manager (FDM) role.

Cost of recommendations

Costs	Amount	Budget details
Capital costs	N/A	N/A
Revenue costs	£412,046.00	Conversion of 6 x Inspector posts to 6 x Chief Inspector posts at £5,779.00 per officer (£34,674.00) 4 x Inspectors (PACE) at £94,343.00 per officer (£377,372.00)
Other	£14,000.04	6 x Cadre TFC course at £2,160.00 per course (£12,960.00) Difference between 6 x Unsociable Hours Payment at 963 hours per officer:

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		<p>Chief Inspector £3.21 per hour (£18,547.38)</p> <p>Inspector £3.03 per hour (£17,507.34)</p> <p>Difference: £1,040.04</p>
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- **To note: In addition to the above, there are currently 6 substantive Inspector vacancies across the Response function (2 on each of the 3 divisions). These are established posts and so have not been included here as additional cost, however these posts will need to be filled.**

Detail how the proposals contribute to:

- **HMICFRS PEEL recovery plans – consider:**
Not applicable
- **Performance improvement plans**
 - The uplift in custody staff, both at Sergeant and Inspector level, will remove current ‘gaps’ in the provision of PACE cover, minimise impact on colleagues outside the Criminal Justice Department in terms of cover requirements and ensure that additional and increasing demand linked to prisoner numbers can be legally, professionally and efficiently managed.
 - The realignment of Vanguard resources to Divisions / Crime Command will ensure local ownership and accountability in terms of proactivity and service delivery to the public around key local priorities.
 - The realignment of TAU resources to Divisional Response Teams will provide a holistic Student Constable tutoring experience whilst ensuring that current Response vacancies are filled.
 - The provision of a 24/7 ‘on-duty’ Chief Inspector capability within the Constabulary, in a Force Duty Manager role, will ensure that the Force is fully compliant with the Manchester Arena Report recommendations in relation to Command Resilience.
- **VIAWG**
Not applicable
- **Police Race Action Plan**
Not applicable
- **The Constabulary`s plans to be an anti-discriminatory organisation. This means not only acting in a non-discriminatory way, but addressing systemic inequalities, disadvantage and discrimination.**
Not applicable

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Specific business benefits:-

- The three year monthly average for custody detentions is 658. Authorised detentions have been increasing since May 2022 to a new 'normal' of over 700 detainees per month. December 2023 saw the highest number of custody detentions at 762. Additional factors such as bail demand (10 – 15 people answering bail per day), DA critical incident, stage 1 charging and more complex needs of those being detained further impacts on custody resources. An increase in Sergeants and Inspectors, in line with additional demand, gives the following specific benefits:
 - Improved quality assurance, governance and oversight in relation to custody provision and outcomes for detainees
 - More accurate detail recorded on custody records
 - Enhanced governance and oversight of the use of force in custody (currently inaccurate and sometimes missing)
 - Further capacity to complete reviews of use of force incidents
 - Robust compliance with the requirements of Code C of the Police and Criminal Evidence Act 1984
 - Improved compliance with Section 31 of the Children and Young Persons Act 1933 relating to the care of girls in custody
 - Significantly less reliance on colleagues from wider Force cohorts to cover PACE requirements (currently a rota provides cover on lates every day and also earlies at the weekend)
 - Maintenance of complex and numerous CJ related portfolios
- The provision of a cadre of 24/7 'on-duty' Chief Inspectors, as Force Duty Managers, ensures that the Force is compliant with the recommendations from the Manchester Arena Enquiry, specifically recommendation R79 in relation to Command Resilience, and our ability to efficiently set up and chair a TCG when necessary. In addition, this capability would allow the Force to collapse the current Silver rota and consider options in relation to:
 - Portfolio ownership
 - 24/7 scrutiny of key performance areas
 - Visible senior leadership
 - JESIP compliance
- The collapse of the TAU ensures additional resource is returned to Divisional Response Teams whilst providing a holistic Student Constable tutoring experience ensuring well-rounded officers with a depth and breadth of experience at the point of confirmation in rank. Specifically:
 - There are 19 Constables within the TAU (not including Assessment Unit) to redeploy to response. This is in addition to a further 13 officers to be posted via forthcoming RMP meetings. This gives a total of 32 officers to fill current response Constable vacancies of 35 (as at 24/01/24) assuming an establishment of 270.

- Postings methodology and vacancy priority would be managed via RMP with tactical advice from HR and INSP Rob Lawton based on the AED picture. A business analyst will be required for a more detailed piece of work to understand where an officer's substantive post would be held during the extended Response experience and the most conducive times to release Eol opportunities for other roles, ensuring Response does not become overestablished.
 - TAU moves could be completed by 9th April 2024 in readiness for the new cohort of 22 Student Constables (cohort 1/24) commencing their tutor phase on 8th July 2024.
 - See Appendix B for indicative Student Officer recruitment phases over the coming months.
 - See Appendix C for proposed Student Officer Tutorship Journey.
- The redeployment of Vanguard resources ensures local ownership of and accountability for proactive capability to target areas of local concern. Divisional resources would be line managed by one of the two NPT Inspectors. Within Crime Command, the resource would be owned/tasked through the Intelligence Department and supervised by an Intelligence DI. The team will be responsible for dealing with any high THR SOC / Vulnerability crime types and will bridge the gap between NPT and SOCU. Their tasking will be governed through monthly tactical tasking and daily tasking processes. The re-distribution of Vanguard resources would be as follows:
 - C&S Division: 1PS, 6PC
 - C&T Division: 1PS, 8PC
 - F&G Division: 2PS, 9PC
 - Crime Command Ops Team: 1PS, 6PC

Person responsible for implementation:-

To Be Confirmed – depending upon the business area in question.

Once approved by the relevant Board member who will present this paper, please submit it to the **Executive Support** mailbox two weeks before the date of the meeting.

THIS SECTION IS REQUIRED FOR ALL PAPERS

Public Access to Information

Information contained within Constabulary papers is subject to the Freedom of Information Act 2000. Reports which are submitted for consideration at PCC Governance Board are likely to be made public. If the paper contains sensitive information then please detail below.

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<p>Is this a decision of significant public interest?</p> <p>This includes a decision with any impact on the community, expenditure in excess of £50,000, or any decision that would be of obvious interest to the media or the general public</p>	<p>*** Yes ***</p> <p>There is significant additional expenditure in excess of £50,000</p>
<p>Does this report contain sensitive information?</p> <p>Does this report contain any information which falls into these categories?</p> <p>a) would, in the view of the chief officer of the police, be against the interests of national security;</p> <p>b) might, in the view of the chief officer of police, jeopardise the safety of any person;</p> <p>c) might, in the view of the chief officer of police, prejudice the prevention or detection of crime, the apprehension or prosecution of offenders, or the administration of justice; or</p> <p>d) is prohibited by any enactment.</p> <p>e) breaches commercial sensitivity</p>	<p>*** No ***</p>

<p>ORIGINATOR CHECKLIST (MUST BE COMPLETED)</p>	<p>Comments These sections must not be left blank</p>
<p>Has legal advice been sought on this submission if required?</p>	<p>No</p>
<p>Has the Chief Finance Officer been consulted, if required?</p>	<p>Yes – has been involved in discussions at CGB on 14th December 2023 and 16th January 2024.</p>
<p>Have equality, diversity and human rights implications been considered, as appropriate?</p>	<p>Yes</p>
<p>How are the recommendations consistent with the Police and Crime Commissioner`s objectives?</p>	<p>The recommendations support the ‘Strengthening Your Constabulary’ objective with due regard to the Strategic Policing Requirements of Terrorism, Civil Emergencies and Threats to Public Order and/or Safety.</p>
<p>Has consultation been undertaken with people or agencies likely to be affected by the recommendation?</p>	<p>Significant consultation has been undertaken with a wide range of colleagues including: Federation, NPT, Response, RIT, Vanguard,</p>

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	TAU, CJD, DPU, Superintendents and OPCC.
Has communications advice been sought on areas of likely media, community, staff or partner interest and how they might be managed?	No specific communications advice has been sought however, as part of discussions at two previous CGBs, the Constabulary's Head of Public Affairs, Communication and Engagement has been present.
Have all relevant implications and risks been considered?	There are a number of risks and implications associated with these decisions, predominantly financial and resource based, which have been considered on an ongoing basis over the course of two previous CGB discussions.
Has this paper /proposal been submitted through any other Constabulary boards? If so, please detail along with the date and result.	No

1. Purpose / key drivers of report

The purpose of this report is to pull together discussions across four key areas:

- CJD establishment (Inspectors and Sergeants) in the context of increasing prisoner detentions and the provision of 24/7 PACE cover
- The establishment of a 24/7 'on duty' Chief Inspector capability to enhance Command Resilience and meet recommendations from the Manchester Arena Enquiry
- Ownership and accountability of proactive capability on a local basis as opposed to the current centralised model
- The tutoring model currently afforded by the Constabulary

Sections 2 (content and background), 3 (options / recommendations), 4 (financial / resource implications) and 5 (risk assessment) will be addressed for each of the areas highlighted at the beginning of this report.

- (i) **Collapse of the centralised TAU function and return of tutors to divisional response teams. Tutees to be tutored within response.**

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The Constabulary currently provides a centralised TAU function, managed by the Learning and Development department. Tutees undertake their tutor period within the TAU and, on successful completion of their tutor phase, they are permanently posted to the Reactive Investigations Team (RIT). The TAU, in its current form, is a platinum investment in the tutoring process provided by the Constabulary and addresses bespoke needs of a modern tutee including the requirement to complete a Degree level course alongside a demanding, operational role. In addition, the TAU is well placed to ensure early identification and management of Regulation 12 and 13 issues in a professional and consistent way as well as catering for individual tutee needs such as neuro-diversity issues. Within the Force's most recent HMICFRS inspection, the following comment should be noted:

“The force has a dedicated tutor assessment unit, which means it has enough sufficiently experienced and trained tutors to meet demand. Tutors make sure that new recruits are provided with necessary guidance and exposure to incidents to allow them to achieve their training needs. During our inspection, new recruits spoke positively about the regular and meaningful one to one discussions they had with their tutors and supervisors. They also told us that there was good communication between their tutors and the university managing their academic progress.”

However, the disadvantage of the current tutoring method and subsequent permanent posting to the RIT is that Student Officers have limited exposure to operational response and neighbourhood policing roles before being placed into a department containing a high level of risk around complex investigations. There is concern that, at the end of a Student Officer's two-year probationary period, they will lack the operational policing experience of key areas of business. Indeed, HMICFRS also noted:

“But we did find that some new recruits, who have just completed their initial training and tutorship, are being placed in the challenging environment of the Reactive Investigation Team (RIT). This has placed younger-in-service, inexperienced and untrained officers into a team investigating serious crimes, often involving vulnerable victims. During our inspection, some of these new recruits shared their frustration at being assigned to the RIT, as it was not the career path they expected when joining as police officers. Although the force hopes this will provide those officers with early experience of investigating crimes, our inspection found supervisors were often unable to provide new recruits with the guidance required at this early stage of their careers.”

Further to this, there is concern from the University of South Wales (documented 18th January 2024) that young in service officers, who are posted immediately to the RIT after tutorship, are experiencing problems with prioritisation of workload and time management. This is as a result of a high case load per officer leading to a decrease in morale and an increase in attrition rates. Also highlighted are some inconsistencies in the opportunities, potentially as a result of workload, for completion of attachments

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to assist with OCP evidence gathering. The course leader will also describe consistent feedback which is being received around fear that Student Officers will be allocated further work while on their University protected learning time as well as anxiety around not being in the office as they are unable to progress their existing workload.

In addition to these observations, the Constabulary's response function is not yet fully established with a number of vacancies being held within teams.

This paper therefore proposes that the TAU is collapsed and tutors are redeployed to divisional response teams. The tutoring process for future Student Officers will take place within a response environment and provide a prolonged experience of response and neighbourhood policing before a final posting to the RIT. This will be managed by the shift Sergeants and Inspectors.

This proposal would see approximately 19 tutors placed into response vacancies (currently circa 35 based on an establishment of 270). This, coupled with the posting of an additional 13 officers identified during a recent Expression of Interest process for Response, would see the Response function almost at full establishment, significantly mitigating current observations in relation to difficulty meeting demand. See Appendix C for the proposed Student Officer Tutorship Journey.

There are no financial implications to this proposal but there are a number of resource based risks which present:

- (a) There is an imminent OFSTED Inspection due within the Constabulary in relation to the tutoring provision provided. There is a concern that shift sergeants will not understand the requirements or criteria of the PEQF when asked.
- (b) There is concern that Regulation 12 and 13 issues will not be identified and managed in a cohesive way given that tutoring will be provided across Divisions and not within a dedicated TAU. This will be mitigated as the Assessment Unit will remain in place within L&D.
- (c) It is possible that some tutors may decline to continue tutoring were they to be moved back into response. This would result in a fall in tutor numbers. This may be offset by colleagues who would volunteer to become tutors, preferring a response setting as opposed to the TAU. A tutor course is 1 week in length.
- (d) The timeframe for implementation is short. As described above, were this new model to be implemented in readiness for cohort 1/24, posting notifications would need to be given by 9th April 2024. There would also need to be an appeals process built in to the timeline which adds further delay. In addition, the risk identified to the RIT at (e) below is mitigated by the new model being implemented from cohort 2/24 and the DC DHEP officers from cohort 4/24 moving straight to the RIT after completion of their IPS (outside of the normal

process described at Appendix C). Were this to be agreed, the new model would not be implemented until 2nd December 2024, leaving an additional 5 months for postings notifications, appeals, appropriate organisational communication (including, specifically, in relation to Student Officers already posted to the RIT under the current model who would have preferred to remain on response longer in line with the new tutoring proposal) and any training of additional tutors. This would also take account of the learning from the EOM process. However, the potential to redeploy an Inspector post and five Sergeant posts elsewhere in the organisation would be delayed to mid-September 2024 (as opposed to the beginning of April 2024).

- (e) PC resources in the Reactive Investigation Team (RIT) currently stand at 95, this includes 15 officers with EOIs submitted for other posts. The RIT establishment is 130. This establishment was calculated using 12 months' worth of demand data from September 2021 to September 2022. Since that time the number of arrests has increased and remained high. With an increase in officer numbers across the Constabulary this demand is expected to stay at a higher level, a review of the subsequent RIT demand is therefore recommended. The population of the RIT to establishment is currently achieved through cohorts of student officers being posted to the RIT when they achieve independent patrol status (IPS). The timeline for this was originally expected to be June 2024 however due to force wide attrition, abstractions and changes in recruitment numbers this may not be achieved until December 2024. This is also dependant on resource planning decisions to release officers from the RIT in response to EOI adverts as above.

The risks created by an agreement to amend the student flight path relate to the initial delay the change would cause in respect of student cohorts arriving at the RIT. Creating a rotation as proposed would result in a 13 month period where no students would join the RIT. Using an estimated attrition rate from the RIT of 2 per month this would further deplete resources by approximately 26 officers over the period. Once this initial implementation period has passed, student cohorts joining the RIT would restart at the same rate as recruitment. Cohort 1/24 are currently expected to start with the RIT on 16 September 2024. If a decision was taken to implement the new proposal those officers would instead start in Response. The impact of making the change at this time would be that the RIT would remain more than 20 officers below establishment. This figure takes into account 15 more experienced officers leaving the RIT to join response and other roles following the recent EOI adverts. Under the new proposal this deficit in numbers would remain in place for 13 months. Given that further movement as a result of RMP is likely, it is also likely that the deficit would grow over time potentially to over 45 officers below establishment. This presents a significant risk to the organisation, the scale of which cannot be fully understood without a review of RIT demand and confirmation of RMP decisions. Based on the current demand levels and RMP assumptions this would see students carrying an average workload of approximately 22 crimes per head. Students

who have already operated at this workload level have reported a significant impact on their wellbeing. This is partly due to the amount of risk being managed with a large amount of domestic abuse investigations and the limited capacity, skill and experience they have. The university work required of students equates to 0.25 FTE of their time and therefore this work load would need to be managed in 0.75 FTE of duty time. The outcome of operating at this reduced resource level would be a reduction in levels of service for victims including victims of domestic abuse, length of investigations increasing, an increase in LOP dates being missed, an increase in sickness levels and an increased risk of attrition.

This risk could be mitigated if the implementation of this new proposal took place after RIT officer numbers have exceeded the current establishment (130), this would also allow for the attrition expected over the 13 month delay period. Current forecasts show that this is expected to be in December 2024, the first new flightpath cohort would reach independent status on 10 March 2025 and be posted to Response. The risk could also be mitigated further if DC DHEP students remained on the current student flightpath and joined the RIT straight after tutorship. Dependant on intakes this would result in a smaller number of IPS students joining the RIT at the same rate of recruitment during the 13 month initial period, dependant on numbers this could balance with expected attrition from the department during the period.

(ii) **Collapse of the centralised Vanguard function and return of resources to divisional Superintendents / Crime Command.**

In the period of time before the introduction of the EOM, each division had its own Vanguard resource. This was a proactive capability, comprising a number of Constables, which was deployed and directed within the division. The team had its own line management structure comprising an Inspector and two Sergeants.

As part of the EOM implementation the Vanguard resources, whilst remaining locally based, became centrally managed within Specialist Operations (SpecOps) in anticipation of forming a larger team, tasked via Force Tasking, to tackle force priorities. In reality, the tasking process is unclear and local leadership will describe difficulties in understanding Vanguard commitments and how resource can be levered into supporting local priorities.

It is the proposal of this paper that Vanguard resources return to divisional ownership with divisional commanders being accountable for the effective deployment of the resource. The spread of resources is described on page 5 of this paper. Broadly, Vanguard teams feel that the current central ownership is preferred for a number of reasons but, most notably, because they are able to brigade officers for jobs requiring a larger resource and they feel, under divisional ownership, they would become sucked

into neighbourhood policing as opposed to being used proactively. This would be mitigated by clear terms of reference and governance within the Division.

There are no financial risks associated with this proposal, however there are resource based risks which present:

- (a) The Vanguard teams have only very recently been centralised (within the last 8 months). A return to local ownership could be unsettling for staff given the recency of the last change.
- (b) If the teams do not return to divisional ownership, the Inspector post does not become available for redeployment elsewhere within the organisation.

Resources currently work a nominal shift pattern of Monday – Friday, 8am – 4pm with Saturday and Sunday as Rest Days, albeit the consultation document describes flexibility when needed for specific operations or deployments.

(iii) Criminal Justice Department uplift

The Criminal Justice Department currently comprises a number of Sergeants and Inspectors which is described as insufficient to meet current, increasing prisoner demand or the 24/7 service of legal requirements such as PACE cover.

HMICFRS inspected custody facilities in Gloucestershire in 2015. In 2022 they found that of the 19 recommendations made during the 2015 inspection, the force has fully or partially achieved 11. In 2022 HMICFRS reported 3 causes of concerns and 10 AFI's.

It is observed that the force does not have good enough governance and oversight in relation to custody provision or the outcomes for detainees. Senior managers only give limited scrutiny to custody matters. The information to support scrutiny is limited and some of it is inaccurate. Poor recording on custody records makes it difficult to assess how well the force treats detainees and what has happened to them while in custody. There is little quality assurance over custody.

The force doesn't always meet the requirements of Code C of the Police and Criminal Evidence Act 1984 (PACE) for the detention, treatment and questioning of persons, particularly in terms of providing detainees with their rights and entitlements, and the way in which it carries out reviews of detention. It is also not complying with section 31 of the Children and Young Persons Act 1933 (also PACE Code C paragraph 3.20A) in its care of girls in custody. Neither is the force consistently following the College of Policing's APP in important areas of custody provision.

There is little governance and oversight over the use of force in custody. Information to show how often and what force is used, and by which officers, is often inaccurate

and sometimes missing. The force carries out few reviews of use of force incidents to assess how well it handles them. It can't show that when force is used it is necessary, justified and proportionate.

Significant work has taken place to address these and the force will not be re inspected until 2027. However, the causes of concern remain and the AFIs are in the process of being signed off.

There are two proposals for consideration in relation to the uplift of Inspectors:

(a) Option 1 – an uplift of four Inspectors to give an overall establishment of six Inspectors within custody.

Benefits:

- Professionalising the role of the PACE Inspector providing consistent overview of Custody demand and early intervention when demand is complex.
- Cover is managed entirely within the CJ portfolio (excluding leave/training/abstractions).
- Aligned with Response Inspector shifts and Custody Sergeant shifts. Positive impact on building team relationships and a second line of reliance for PACE and Division for short notice sickness or significant incident.
- There are no 'gaps' in cover (currently there is a gap from 3pm – 5pm which is managed by Response).
- Impact on other Inspectors, in terms of rota cover removed. A resilience pool of Inspectors will be needed to cover PACE Inspector abstractions (AL, RDIL, and Training). All Constabulary Inspectors would contribute to this pool.
- CJ portfolio management is maintained (1 x CJ Inspector).
- Could flex to 12 hour shifts to backfill short abstractions should the need arise.

Disbenefits:

- The cost of 4 additional Inspectors required in Criminal Justice.
- The pattern for the Inspectors and Custody Sergeants will not line up with the Police Staff CDOs.
- Too many inspectors cannot do 24/7 policing so it may be hard to find enough Inspectors who are fit to be deployed in a front-line role across earlies, lates and nights.

Federation view:

This option is supported by the Federation. With regards to moving officers to these roles, Inspectors (and Chief Inspectors) are not subject to the protections provided by Regulation 22 (the requirement for a duty rota to be published 90 days in advance). As such, Inspectors may move to this role and to the relevant shift pattern without adherence to that notice period. The Federation would encourage giving affected officers as much notice as is possible, and in any case a minimum of 28 days' notice as is afforded when officers are moved to a new posting location.

(b) Option 2 – an uplift of three Inspectors to give an overall establishment of five Inspectors within custody.

Benefits:

- 1 less Inspector required to staff the model than with option 1.
- CJ portfolio management is maintained (1 x CJ Inspector).
- Impact on other Inspectors, in terms of rota cover, is removed. A resilience pool of Inspectors will be needed to cover PACE Inspector abstractions (AL, RDIL, and Training). All Constabulary Inspectors to contribute to this pool.
- Professionalising the role of the PACE Insp providing consistent overview of Custody demand and early intervention when demand is complex

Disbenefits:

- The cost of 3 additional Inspectors required in Criminal Justice.
- Staff impact (12 hour shifts) and agreement of a VSA with Federation.
- More difficult to facilitate backfill due to 12 hours shifts creating more demand for DPU.
- The pattern for the Inspectors and Police Staff CDOs will not line up with the Custody Sergeants (unless consideration is given for 12 hour shift patterns for Sergeants).
- Too many inspectors cannot do 24/7 policing so it may be hard to find enough Inspectors who are fit to be deployed in a front-line role across earlies, lates and nights.

Federation view:

The Federation would not be inclined to support such a workforce agreement and therefore placing 4 Inspectors on a 12 hour pattern is not currently a viable option. The potential move to a 12 hour shift pattern does, however, bring about an issue with regards to the Working Time Regulations 1998 (WTR). Under WTR there is an average limit on night workers hours of work of 8 hours* in a 24 hour period (and no more than 8 hours if the work is subject to special hazards or strain). There is, as ever, an 'exigency of duty' exemption to this. That clearly does not and will not apply in this situation. Additionally, individual Inspectors may not be approached to opt-out of this rule. The ability to opt-out only applies to the 48 hour weekly working average, not the night work rule. The proposed 12 hour pattern clearly satisfies the first part of this WTR rule, and there is an argument that the risk management and decision-making involved could satisfy the mental strain element too.

A pattern that breaches this rule can be utilised if there is a workforce agreement made by the Federation Branch to allow that particular department to work outside of that Regulation. That has happened in a number of cases including Spec Ops Command. In those instances, officers who would be subject to that shift pattern have been polled, and where a significant majority have expressed a preference for the 12 hour pattern, such an agreement has been made with the force. In all cases, most notably that of RPU officers, the Federation have highlighted a number of concerns about the safety and wellbeing implications of moving to a 12 hour pattern. This case is also slightly

complicated by the fact that there is not an existing cadre of officers in the role, potentially subject to the change, who could be polled. This will affect a small number of currently unknown officers.

It is known, however, from recent experience with Custody Sergeants who have repeatedly been canvassed on this matter, that there is an overwhelming desire not to work the 12 hour pattern in custody. A wide variety of reasons have been given for this, primarily around matters of wellbeing, health & safety, the working environment and the perils of managing the significant risk inherent to the role whilst fatigued. Those reasons have remained consistent even as custody personnel have rotated, suggesting they are not indicative simply of personal preference.

The Federation see no reason why these same factors would not apply equally to PACE Inspectors, nor any reason why Inspectors would be any more inclined to agree to a 12 hour pattern than the Sergeants are.

The most significant risk to either of the above options is the cost involved when viewed in the context of difficult financial decisions currently being taken to balance the Force's budget.

(iv) Creation of a capability for 24/7 'on duty' Chief Inspector coverage for the Constabulary in a Force Duty Manager (FDM) role.

Recommendations from the Manchester Arena Enquiry make it clear that each police service should have in place a system that means appropriately qualified and experienced personnel are rostered 24 hours each day so that, in the event of a terrorist attack or any Major Incident, a prepared and effective command structure can be geared up swiftly.

There is no dispensation of this recommendation for smaller forces or for forces where the likelihood or perception of the likelihood of such events occurring is low. This structure is not currently in place within Gloucestershire Constabulary and, as a result, were such an event to occur, the Force is likely to be found wanting.

As discussed in previous CGB meetings, the reliance on a rota of current Chief Inspectors to perform this 24/7 function is not sustainable. Over half of their time would be given to performing this role which would mean other commitments within Divisions or Departments would suffer. There are two other options to provide this capability:

➤ **OPTION 1: A trained and dedicated cadre of Chief Inspectors.**

This would require an uplift of six Chief Inspectors at a considerable cost (£600,732.00). This is the most significant risk within this proposal. Appendix A provides an indicative role profile of a Force Duty Manager. It must be noted that the training of these officers would take place over a period of time, specifically in relation to Public Order Command where there would likely be only two courses per year given

the need to shadow operations and complete a portfolio to become operationally competent. FDMs would work the current Response shift pattern.

There are two options for the line management of this cadre.

Option (a) sees all 6 Chief Inspectors line managed within SpecOps by the departmental Superintendent. This would ensure consistency of approach and leadership and also provide for a regular place (Bamfurlong) from which officers would start and conclude their duty. The sharing of equipment (e.g. a marked FDM vehicle) is easy to facilitate. The main disbenefit to this approach is that the SpecOps Superintendent would have 8 Chief Inspectors to directly line manage: 2 from within SpecOps and 6 FDMs.

Option (b) sees the line management of the FDMs shared across departments within the Local Policing portfolio (for example each Division would take an additional Chief Inspector as would Crime Prevention Command with SpecOps taking an additional two Chief Inspectors). This ensures that one Superintendent is not responsible for all additional Chief Inspectors and also provides for additional portfolio leadership within a Division or Department. The main disbenefits include:

- Kit, such as a vehicle, may not be easily shared (e.g. a Chief Inspector finishing nights in the Forest and handing over to a Chief Inspector starting earlies in Cirencester).
- There may be inconsistency of leadership across the cadre

It must be noted that line management responsibilities of the FDM, if any, have yet to be discussed and, in addition, all deployable Constabulary Chief Inspectors would need to support cover for the FDM role on occasions when the 6th FDM was not able to do so. Initial training requirements and abstractions of this cadre of officers may necessitate this additional cover.

➤ **OPTION 2: The conversion of the current FIM role from an Inspector post to a Chief Inspector post.**

The Constabulary has an established FIM post within the Force Control Room. This post is currently staffed by an Inspector who is trained as an iTFC. The post is a 24/7 post across a five shift pattern A-E. These posts could be converted to a Chief Inspector post at significantly less cost than Option 1 above. An Inspector post costs £94,343 whilst a Chief Inspector posts costs £100,122. The difference in cost to uplift the FIM role is therefore £5,779 per officer (£34,674 in total). When compared to the cost at Option 1 the difference is stark, particularly in the context of the organisation's £4.5m funding gap and applying a proportionate approach to the likelihood of an event, on the scale of the Manchester Arena attack, taking place within Gloucestershire. The benefits of option 2 include:

- Compliance with the Manchester Arena recommendations as they relate to command resilience. This option sees a deployable Chief Inspector on duty 24/7.

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- Significantly reduced cost to implement in the context of current financial constraints.
- An option to review the tasking processes within the FCR under the leadership of a Chief Inspector, moving to a 'Task' not 'Ask' position and ensuring expectations are explicit.
- Consistency of decision making, at an appropriate senior level, and subsequent briefing to 'on-call' Superintendents where necessary.
- The current 'Silver' rota within Force can be decommissioned minimising abstraction requirements for the wider cohort of Chief Inspectors.
- Development of a 'high risk / high regard' team of FDMs with increased confidence and capability, growing a potential new cohort of effective, aspiring Superintendents.
- Facilitation of kit transfer (e.g. vehicle) between officers is streamlined.

Option 1 above (dedicated cadre of Chief Inspectors) would be the platinum response to increasing command resilience however, as discussed, it comes at considerable cost during a time when difficult financial decisions need to be taken across a range of business areas.

It is therefore recommended that Option 2 above (conversion of current FIM role from Inspector to Chief Inspector) would be the most appropriate option, delivering the benefits articulated at a significantly lower cost. It should be noted that this option provides for the deployment of the Chief Inspector from the Control Room to a given location when needed in light of the fact that a suitably trained Sergeant (iTFC) would also be on duty working alongside the Chief Inspector. Thus, if the Chief Inspector were to be deployed, the Sergeant would continue to provide 'Business as Usual' particularly in the field of firearms deployments. This option provides opportunity for a close, professional working relationship between the Control Room Chief Inspector and Sergeant in the context of ongoing personal and professional development, training and mentoring to increase confidence in the role. The Chief Inspector would be the single point of contact for the 'on-call' duty Gold officer providing effective briefings and receiving tasks / direction for implementation. There is also capacity to ensure provision of a suitable vehicle for the FDM to support deployment when needed.

Option 2 has been discussed during a meeting of the Executive Team on Wednesday, 6th March 2024 and substantively agreed. It has also been agreed that a public order and driving qualification would not be needed for this role.

(v) **Proposed nomenclature:**

- *Division: A defined geographical area, within the Constabulary, led by a Superintendent. A Division will comprise two Local Policing Areas (LPAs).*
- *Local Policing Area (LPA): A defined geographical area, smaller than and contained within a Division, led by an Inspector.*

We are committed to being an anti-discriminatory organisation. This means not only acting in a non-discriminatory way, but addressing systemic inequalities, disadvantage and discrimination.

- Force Incident Manager (FIM): *A control room based Inspector, trained as an iTFC, overseeing the initial deployment of firearms assets and pursuits. The FIM will also have oversight of demand and resource allocation along with emerging threats.*
- Force Duty Manager (FDM): *A 24/7 deployable and visible Chief Inspector working a shift based pattern of earlies / lates / nights. The FDM is the Force's senior 'on-duty' officer working at the Silver / Tactical level.*
- Neighbourhood / Crime Task Force (N/CTF): *A proactive capability, aligned to each Division and Crime Command, deployed in line with local / force priorities.*

6. Equality and Diversity impact assessment

Not yet completed.

7. Environmental impact assessment

It is not anticipated that there will be any effect on the Constabulary's approach to the environment and delivery of ISO 14001 environmental management systems requirements.

8. Consultation matrix

Executive Support to circulate and collate responses into one feedback matrix.

9. Departmental contact

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Appendices

Ensure any relevant reference is added to each paper, for example: CGB Business case

A: Draft Role Profile – Force Duty Manager (FDM)
B: Indicative Student Officer recruitment phases
C: Proposed Student Officer Tutorship Journey

Version history – summary of previous versions and amendments

Version, date and change history:	Version	Date	Summary of change history
	1.0	17/01/24	New paper commenced.
	1.1	13/03/24	Updated following Exec Meeting on 06/03/24 to reflect discussions around conversion of FIM posts from INSP to CH/INSP.

Executive Board member approval:	
Name:	ACC 255399 Donna LAWTON
Date:	9th February 2024

Security marking:
Official