Thank you for the copy of the “Time For Justice” report which you kindly sent; I have read this with interest. Studies such as this are, of course, crucial in providing us with a better understanding of matters affecting our workforce, particularly during these challenging times of austerity and significant change. I would like to take the opportunity to respond individually to each of the 5 actions you request are undertaken - as you will see, as a Force we are already addressing these:

1. Each Force must have a proper recording system for working hours
   All Inspecting ranks (including detectives) use the ‘DMS’ system to record working hours (except those in CRED who use the separate PIPKINS system). The majority of Inspector records are up to date in terms of the “Book On Book Off” (BOBO) process when looking at the Working Time Regulations (WTR) report, which provides an average over 17 weeks. Of course, this does rely on the individual recording their hours promptly and accurately.

2. Each Force must properly maintain an Occupational Health Service
   We currently have a comprehensive Corporate Health Department, which includes Occupational Health professionals and Welfare Officers. This service has been enhanced by the recent introduction of an independent Employee Assistance Programme, which is available 24 hours a day, 365 days a year for all officers and staff. We also have mandatory support interviews for Inspectors working in stressful roles such as Protecting Vulnerable People.

3. Each Force must address the issue surrounding resilience of the Inspecting rank
   The work we undertook as part of the Local Policing Model meant that 40 Inspectors were allocated to the Patrol function, which was later increased to 45 following the introduction of a new shift pattern. This helps meet demand, and should also help individuals manage their hours more effectively.

   All other Inspectors/Chief Inspectors (other than those detectives who form part of a CID rota) now assist with PACE requirements following a decision that all Inspecting ranks must form part of a rota. This was put in place to ensure the additional requirements were shared between everyone, rather than a small pool of locally based Inspectors, thus further easing the burden on individuals and assisting in managing their hours. A review of this new system will be carried out later this year to assess its effectiveness.
4. Each Force must ensure that the Working Time Regulations are adhered to
As you know, the Working Time Regulations state that individuals should not work more than 48 hours per week, averaged over 17 weeks. Our Working Time Management Policy gives details of our escalating response to excessive hours being worked. The number of hours worked above this will inform our decision as to whether an action plan is developed in conjunction with an individual’s line manager (e.g. to help manage workload) or whether an enforced rest period is initiated prior to the development of a future working plan.

Our Health and Safety Manager has access to the WTR report to ensure hours are monitored through the Force Health and Safety Meeting at a corporate level.

It is very clear that line managers have a responsibility to monitor the working hours of their staff and should respond appropriately where issues are identified. A large number of officers have chosen to opt out of WTR, which allows us as an organisation (as well as them as individuals) more flexibility around their working hours. That said, we take our welfare responsibility very seriously, fully accepting that we may be held to account should any injuries or damage be caused following the working of an excessive number of hours, particularly if WTR levels are breached.

5. That Chief Officer Groups appreciate, and offer support to, the Inspecting Rank
It goes without saying that my colleagues and I work hard to provide a high level of support to all officers and staff at all ranks, and there are many mechanisms in place to address any perceived shortfalls in this respect.

The report specifically refers to the perceived lack of opportunity for part time/flexible working Inspectors. We currently have 8 part time Inspectors (4%) and 1 part time Chief Inspector (1.9%). In the recent past there have been a further 8 part time Inspectors who have either returned to full time hours (5) or retired (3). At least four Sergeants passed their inspector board during pregnancy or after returning to work following maternity leave and were promoted as part time Inspectors. I hope these figures reflect the opportunities and support we provide to all officers, regardless of circumstances. I appreciate that some officers do not feel it appropriate to work part time due to the demands of their role, but again, information and support is available to any officer who wishes to consider the option. On a related note, we have recently implemented a system for paying part time Inspectors/Chief Inspectors for additional hours worked, including back payment if applicable.

I hope the above provides reassurance that the “Time For Justice” report is being taken very seriously by this Force, and that we are already carefully considering many of the issues it raises. I am confident that we provide a high level of support to all those at the Inspecting rank, and will continue to enhance this over time.

Yours sincerely

Sara Thornton
Chief Constable