

## Business Case (Gate 3)

<b>Title</b>	Professional Standards Branch	
<b>Project Code</b>	n/a	
<b>Programme Name</b>	Transforming PSBi	
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<b>Date of paper</b>	July 2017	
<b>Chief Officer Sponsor</b>	DCC Ian Piling	
<b>Sign off for Resources Board submission</b>	<b>By:</b>	<b>Date:</b>

### Summary description of project

In October 2015, GMP commissioned a programme of review and reform of Professional Standards. The context at this time was of repeated concerns raised of corrupt practices, racism and investigative disproportionality within PSB. Such concerns were subject of media scrutiny, and represented a real risk to legitimacy and confidence of communities in GMP.

The commissioned programme of review; 'Transforming Professional Standards in Greater Manchester Police' was led by two consultants, [REDACTED] and John Armstrong (*Former Chief Superintendent of Cheshire Professional Standards Department & currently independent advisor to the national Complaints & Misconduct Working Group – Standards & Ethics*).

The tangible deliverables under the initial phase of PSB Transformation have been:

- Scheme of Delegation - providing clarity around decision-making responsibility in compliance with legislative requirements
- Scheme of Governance – to set and maintain an appropriate accountability framework and reporting structure for the governance and scrutiny of complaint and conduct matters
- A standard initial and final assessment regardless of which formal assessment is being considered: for Regulation 12, Regulation 19 and Para 23/7 decisions - to evidence demonstrable transparency and decision making and procedures
- Agreed vision for PSB—to include organisational learning and prevention and education
- Improved stakeholder engagement – regular engagement with stakeholders to promote confidence in the complaints and misconduct system.

The Leadership Review, in September 2016, as part of a review of the management structure arrangements in PSB, established the need to build upon the work conducted and develop proposals to mitigate the systemic issues highlighted within the 'Transforming Professional Standards In GMP' review, as such;

- Regulatory compliance,
- Transparency,
- Speed of investigations and the
- Documentation of decision making.

PSB is governed by a requirement to adhere, delegate and deliver appropriate services for complaints handling and misconduct issues in line with the;

- Police Reform Act 2002
- Police Reform & Social Responsibility Act 2011
- Part 2 Policing Crime Bill 2018

The review of the PSBi (Professional Standards Branch Investigations) has focused on understanding current

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process, policy, procedure and its management structure through collation of data, information, observation, workshops and focus groups.

A Systems Thinking methodology was utilised to identify the business changes required in purpose, principles, processes, capabilities, roles, structure and personnel. It is through this methodology that the review team has identified critical changes that will enhance the current service and performance of Professional Standards Branch for GMP.

**As such this business case details the request for the permission to consult on the following changes:**

- **The creation of an Assessment Team in PSBi (5 x E Grade Police Staff posts)**

Purpose

To provide a customer focused assessment and decision making function for the recording and handling of public complaints and misconduct matters. By creating a front end system, with the correct resources and skills, for the receipt of all demand into PSB will provide a more consistent capability and foster a more interactive approach to complainant management, with improved timeliness and creating the environment for the necessary and proportionate response to demands entering the unit.

Benefits

Improved customer relations through greater interaction

Able to explore earlier resolution of complaints with complainants

Increased speed of recording

Enable improved ability to deal with today's demands today

Earlier identification of threat, risk and harm

Staff trained and invested in to support the requirements of the complaints and misconduct process and meet the intentions of the new Policing & Crime Bill around complainants

- **An uplift in the establishment of Police Constables – 13 to 21 FTE, for Assessment, Investigation and Coronial Teams.**
- **Dis-establish 1 FTE x Inspector + 1 FTE x Sergeant post**

Purpose

To provide the appropriate level of resource to PSB investigations into public complaints and misconduct to enable greater and more consistent investigatory standards, balanced workloads and provide the capacity to focus on customer relationship building. By creating consistent documentary standards, increasing the Appropriate Authority capacity and capability to make decisions will enable greater confidence in the service provided to both public complainants and officers within GMP.

Benefits

Greater interaction with complainants to enhance the reputation of GMP's commitment into investigations of complaints and misconduct.

New documentary standards will provide greater clarity, consistency and transparency around decision-making, investigative actions and contact history.

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Enable investigators to have appropriate workloads to better manage customer interaction and follow accepted best practices for i.e. interviewing rather than obtaining accounts.

Investigators as advocates for professional standards within GMP, supporting divisional colleagues with advice and guidance on complaint and conduct matters.

Become an instrumental part of the delivery of misconduct hearings and meetings as the role of Investigator.

Contribute to the development of organisational learning through outcomes as a result of investigations conducted.

### An Organisational Learning arm of Professional Standards

- **Creation of 1 x Grade G Intelligence Analyst**

#### Purpose

To provide a central point for the collation, logging, analysis, dissemination and interventions in relation to identifiable broader organisational learning from the current review and reporting functions within GMP.

#### Benefits

Corporate memory for learning derived from reports, recommendations, reviews and intelligence submissions.

A function to support the Organisational Learning board to identify, action and support the implementation of and maximising of GMP wide learning.

Improved ability to cascade and deliver learning for the benefit of GMP officers and staff, focusing on prevention and education.

The following tables give a financial comparison of changes to the proposed establishment:

#### Financial Comparison of changes to Proposed Establishment

Current establishment			Proposed establishment			Changes to establishment		
	FTE	£		FTE	£		FTE	£
Police officer	32	2,013,629	Police officer	38	2,274,320	Police officer	6	260,691
Police staff	21	669,803	Police staff	27	887,042	Police staff	6	217,239
<b>Totals</b>	<b>53</b>	<b>2,683,432</b>	<b>Totals</b>	<b>65</b>	<b>3,161,362</b>	<b>Totals</b>	<b>12</b>	<b>477,930</b>

Current Strength			Cost comparisons		£
	FTE	£			
Police Officer	37.6	2,292,604	Proposed establishment to current establishment		477,930
Police Staff	19.8	633,725	Proposed establishment to current strength		235,033
<b>Totals</b>	<b>56.4</b>	<b>2,926,329</b>			

#### What are the project's timescales? (Planning and Execution)

Please transfer the high level project milestone information on timescales from section 5 into this table.

Stage	Estimated Duration
Construct	3 Months
Implement	1 Month

#### Recommendations and decisions required

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1. Do the Resources Board and Chief Officers approve the recommended implementation of the solution as described in Section 2?

*Summary of Change Requested;*

*Creation of Assessment Team*

- Establishment of 5 x E Grade Police Staff FTE
- Establishment of 1 X G Grade Police staff FTE

*Uplift in Investigator FTE*

*Creation of an Organisational Learning function within PSB*

- Established PC posts increased from 13 to 21 FTE.
- Decrease in established posts - 1 x Inspector FTE & 1 x Sergeant FTE.

2. Do the Resources Board and Chief Officers agree the funding as detailed below?

*Please copy & paste 'Table 1' from 'Recommendations & Decisions' tab in the financial workbook*

There is no investment required for implementation

3. Do the Resources Board and Chief Officers agree the ongoing revenue costs and savings as detailed below?

**Consultation has taken place with the Head of Finance and options identified for potential sources of recurrent funding;**

- 1) Find corresponding police staff savings from elsewhere in the organisation
- 2) Move officer posts from elsewhere in the organisation and use instead in the organisation
- 3) Reduce police officer posts accordingly
- 4) Bid for recurrent funding from the Deputy Mayor

Further consultation has taken place with ACO Potts to identify savings from within the organisation.

*Please copy & paste 'Table 2' from 'Recommendations & Decisions' tab in the financial workbook.*

Future Revenue Implications						
Description	17/18	18/19	19/20	20/21	21/22	Total
Revenue <b>Savings</b>	-£99,754	-£199,506	-£199,506	-£199,506	-£199,506	-£897,778
Revenue Costs	£333,465	£657,429	£657,429	£657,429	£657,429	£2,963,181
Net ( <b>Savings</b> )/Costs	£233,711	£457,923	£457,923	£457,923	£457,923	£2,065,403
External Funding						
Net GMP ( <b>Savings</b> )/Costs	£233,711	£457,923	£457,923	£457,923	£457,923	£2,065,403

*Future revenue implications split into by police officer, police staff and other*

Future Revenue Implications						
Description	17/18	18/19	19/20	20/21	21/22	Total
Police officer salary savings	-£65,495	-£130,989	-£130,989	-£130,989	-£130,989	-£589,451
Police staff salary savings	-£34,259	-£68,517	-£68,517	-£68,517	-£68,517	-£308,327
Police officer salary costs	£195,840	£391,680	£391,680	£391,680	£391,680	£1,762,560
Police staff salary costs	£132,875	£265,749	£265,749	£265,749	£265,749	£1,195,871
Non staff related costs	£4,750					£4,750
Net ( <b>Savings</b> )/Costs	£233,711	£457,923	£457,923	£457,923	£457,923	£2,065,403

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4. Do the Resources Board and Chief Officers agree the staffing resources for implementation as detailed below?

Please copy & paste 'Table 3' from 'Recommendations & Decisions' tab in the financial workbook.

Investment Funding Requiring Approval	Total Project People Resources		Cost of Project People Resources		
	No. of People	Work Days	Capital	Revenue	Total
External Resources					
GMP Resources					
Funded People Resources					
No Funding Required					
GMP Internal Resources	6.0	198.0			
Total Project Resources	6.0	198.0			

5. Do the Resources Board and Chief Officers agree that formal consultation can begin in order to make the following changes to the establishment?

Please copy & paste 'Table 4' from 'Recommendations & Decisions' tab in the financial workbook.

Establishment Summary (FTEs)						
Post Type	17/18	18/19	19/20	20/21	21/22	22/23
<b>Officers</b>						
Current Establishment	32.00	32.00	32.00	32.00	32.00	32.00
Increase/(decrease)	6.00	6.00	6.00	6.00	6.00	6.00
<b>Revised Officer Total</b>	<b>38.00</b>	<b>38.00</b>	<b>38.00</b>	<b>38.00</b>	<b>38.00</b>	<b>38.00</b>
<b>Staff</b>						
Current Establishment	21.00	21.00	21.00	21.00	21.00	21.00
Increase/(decrease)	6.00	6.00	6.00	6.00	6.00	6.00
<b>Revised Staff Total</b>	<b>27.00</b>	<b>27.00</b>	<b>27.00</b>	<b>27.00</b>	<b>27.00</b>	<b>27.00</b>
<b>PCSOs</b>						
Current Establishment						
Increase/(decrease)						
<b>Revised PCSOs Total</b>						
<b>Total</b>						
Current Establishment	53.00	53.00	53.00	53.00	53.00	53.00
Net Increase/(decrease)	12.00	12.00	12.00	12.00	12.00	12.00
<b>Revised Total Establishment</b>	<b>65.00</b>	<b>65.00</b>	<b>65.00</b>	<b>65.00</b>	<b>65.00</b>	<b>65.00</b>

6. Please list any other specific decisions you want the Resources Board and Chief Officers to make regarding the project.

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## **1 REASON FOR CHANGE**

This business case has been produced in response to Chief Officers decision on the 7<sup>th</sup> March 2017 Strategic Design Authority for the 'Transforming PSBi' review to provide a detailed understanding of a proposal in relation to the;

- Creation of an Assessment Team in PSBi.
- Investigator Uplift against PSBi establishment.
- Creation of an Organisational Learning and Prevention function within PSBi.

### **History**

In October 2015, ACC Shewan, then GMP Chief Officer lead for PSB, commissioned a programme of review and reform of Professional Standards in GMP. The context at this time was of repeated concerns raised of corrupt practices, racism and investigative disproportionality within PSB. Such concerns were subject of media scrutiny, and represented a real risk to legitimacy and confidence of communities in GMP.

In response to this, three related activities were commissioned:

- A review of the cases most frequently cited as evidence of corruption and racism by HHJ William Morris.
- A peer review conducted by Metropolitan Police Service.
- Transforming PSB – A programme of evaluation, reform and change, consultant led and externally reporting.

The concluding reports produced by HHJ William Morris and MPS have been submitted to Chief Officers.

The commissioned programme of review; 'Transforming Professional Standards in Greater Manchester Police', was led by two consultants [REDACTED] and John Armstrong. The context of the commission, and the need for external scrutiny led to the creation of an External Reference Group as the reporting mechanism for the reform project.

This review did not identify any evidence of corruption, but did highlight systemic issues in PSB including;

- Regulatory compliance,
- Transparency,
- Speed of investigations and the
- Documentation of decision making.

The deliverables under this phase of PSB Transformation have been:

- Scheme of Delegation - providing clarity around decision-making responsibility in compliance with legislative requirements
- Scheme of Governance – to set and maintain an appropriate accountability framework and reporting structure for the governance and scrutiny of complaint and conduct matters A standard initial and final assessment regardless of which formal assessment is being considered: for Regulation 12, Regulation 19 and Para 23/7 decisions - demonstrable transparency and decision making and procedures

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- Agreed vision for PSB—to include organisational learning and prevention and education rather than solely complaints and discipline
- Improved stakeholder engagement - regular engagement with stakeholders to promote confidence in the complaints and misconduct system.

These were realised through externally driven change, which by necessity was top down in nature. Further to this, the earlier project implemented standalone processes, but did not consider the full end to end process, or capacity within the current Branch structure to operate the new processes. The earlier project work did not address Branch culture, skill set or role profiles.

Therefore the current PSB Transformation Project has sought to build on these foundations, but ensure both staff engagement and ownership of further change.

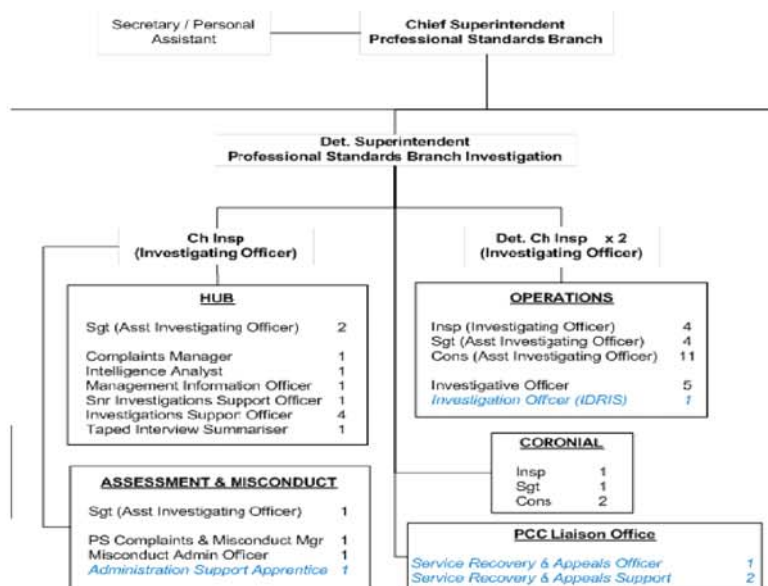
## 1. Branch Introduction

The Professional Standards Branch organisational chart incorporates the following departments;

- Force Vetting
- Anti-Corruption Unit
- Professional Standards Branch Investigations

This review is primarily concerned with the provision of recording, assessment of and conducting of investigations into public complaints, internal misconduct and business interests provided by Professional Standards Branch Investigations (PSBi). The unit structure is presented below;

### Current PSBi Structure



## 2. Context

The work of the PSBi (Professional Standards Branch Investigations) is driven by a requirement to fulfil the statutory obligations of the Police Reform Act 2002. Further amendments to legislation were made under the Police Reform & Social Responsibility Act 2011 and working within the Police Complaints & Conduct Regulations 2012, designed to streamline and remove unnecessary bureaucracy from the complaints system, ensuring that

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complaints are handled at the lowest appropriate level and focus more on resolution of complaints made by members of the public.

In March 2018 Part 2 of the Policing & Crime Bill 2018 will be enacted and bring further legislative changes that will impact on the Police complaints system landscape for handling of complaints and misconduct.

In essence this Bill aims to;

- Broaden the definition of a complaint to cover customer service and police practise issues
- Resolving issues informally outside of the complaint system
- Remove the recording decision requirement to move to record all issues as complaints
- Simplify handling of complaints with duty to take reasonable and proportionate action
- Streamline appeals process – one review point at outcome of complaint to PCC/Mayor
- Potential for PCCs/Mayor to take enhanced role in complaints handling

Predicted changes in demand and compliance with new statutory duties;

- Currently a complaint has to be about the conduct of an officer. The new definition will be “any expression of dissatisfaction with a police force”. Various categories for currently handling a complaint (local resolution, disapplication, discontinuance, non-recording) will be removed and a complaint must be formally recorded if the complainant wants it recorded
- A series of statutory duties on the force will be introduced; to contact the complainant to understand how the complaint might be resolved; to keep complainant updated; and to inform of the outcome
- Increased role for PCC’s – an explicit statutory duty to hold the Chief Constable account for complaints handling.

Police & Crime Bill 2018 - PCC options

As part of the introduction of the 2018 bill also supplied the option for PCCs to extend the ownership of certain functions on the complaints process. Model A is a mandatory requirement to control the appeals process currently heard by the Chief Constable.

Models B and C are options for the Mayor to consider. At this time it is anticipated that it would be 2-3 years before, if agreed by the Mayor, that the transfer of these functions could begin.

The proposed changes to PCC complaints handling are:

- Model A (Mandatory): All PCCs will have a statutory responsibility for the performance of the local complaints system including as the appeal body for complaints currently heard by the Chief Constable.
- Model B (Optional): In addition to the mandatory responsibilities, also responsible for the initial part of the complaints handling process.
- Model C (Optional): In addition to the above responsibilities, responsible for all statutory duties regarding contact with the complainant throughout the process.

*Model Options B and C present significant operational challenge. These options have the potential to degrade the service to the public, as these effectively separate the contact with the complainants from the investigative process, creating a disjointed system for the control of complainant contact and investigation.*

*An outgoing PCC briefing paper to the new Mayor’s officer has outlined the challenges with regard to Models B and C around information sharing, GMP remote access, resource levels required. As such a further commissioned project would be required to detail the fuller requirements required to deliver these services independently of GMP.*

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### **Further Considerations – Inspections**

Guidance and inspection requirements, as highlighted below from the IPCC, evidence the clear belief that effective understanding and resolution involving the complainant is essential in the investigative process.

#### *IPCC Guidance*

- *An investigation into a complaint should focus on resolving the issues the complainant has raised. The complainant is likely to have lowered confidence in the police; otherwise they would not have raised a complaint. The actions of the investigating officer (IO) during the investigation should seek to rebuild the complainant's faith in the police in general, as well as address the substance of the complaint.*
- *It is best practice to meet with a complainant wherever possible and secure the complainant's agreement that the complaint/s have been recorded accurately*
- *It is a legislative requirement to update the complainant and interested parties every 28 days. Lack of compliance with this obligation, or lack of substance to the update, is a frequent grievance that complainants raise with the IPCC.*

To improve the response of the current PSBi under the terms of these legislative requirements, a review was undertaken utilising systems thinking methodology, to design a future operating model that will better equip GMP to handle both public complaints and internal conduct matters, focusing on delivery of timely, proportionate and ethical assessments, investigations and administering of misconduct proceedings.

The review identified some clear operational de-efficiencies that, by conducting fundamental change, would provide real benefits in terms of service capacity and capability, directly benefiting the services we offer to the communities of GMP.

### **3. Reasons for Change**

The initial phase of PSB reform has delivered tangible outcomes and this primarily focused upon critical changes to improve the operational effectiveness of the Branch; create a culture of integrity, fairness and impartiality and build effective engagement with stakeholders. Further 'business as usual' changes have been implemented and continuous improvement has delivered further improvements. However, the current branch structure has been built in silos because of past changing agendas and the response to various challenges at that time. It is clear that making material changes to the operation of PSB cannot be executed simply by business as usual style changes. Therefore, a systems thinking approach has been undertaken to deliver the vision and purpose of Professional Standards.

The PSBi 'As Is' currently can be summarised as;

- Limited staff capacity for meaningful contact with complainants which undermines public confidence in our service. No priority given to or desire to make contact with complainants at point of complaint or establish effective relationships with complainants throughout the investigative process.
- Slow response, from poor processes, to complaint recording which diminishes the perception of our service commitment to the public. Extended time to record and acknowledge complaints from the public, currently 7-10 days as a minimum.
- Limitations in decision making approach will diminish PSBs efforts to evidence ethical practise and transparent processes.

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- Limited staffing capacity, outside of conducting investigations, within the PSBi prevents greater support and advice to GMP colleagues as the 'upholder' of standards and ethics.
- Officers will remain on restrictions and suspensions for extended periods, up to 171 days on average, due capacity and capability of current systems, processes and people, whilst complainants wait extended periods for outcomes to complaints.
- PSB's ability to identify, co-ordinate and maximise organisational learning opportunities limited by any availability of staff. Over 1035 reports, recommendations and actions logged around GMP from review functions without any central analysis or corporate memory function.

Due to the current lack of understanding regarding the level of demand (exacerbated by poor IT systems), the inability to allocate the work to the right resources at the appropriate points and the volume of work, with competing demands and conflicting priorities on staff time, all of which undermine the department's ability to deliver effectively against these expectations.

### ***Issue 1 – Operating Principles***

- ***No defined operational principles to which functions, internal processes and roles are aligned***

At present the PSBi operate in silos, which have been subject to changing agendas in response to varying challenges the branch has faced. Each differing element of the unit operates without a clear understanding of its purpose and how it contributes to the overall delivery of complaints and misconduct. It is clear that making material changes to the operation of these units cannot be executed simply by business as usual style changes.

The current focus of activities is aligned to internal processing rather than an outward looking view of the complainant and stakeholders interacting with and requiring a service from the PSBi.

The flow of work is defined by pre-existing unit structures, hierarchy, a substandard IT case management system and conducted by individuals with roles that do not accurately reflect the type of work undertaken. Job descriptions reflect out dated and traditional task orientated responsibilities rather than purpose and accountabilities.

### ***Issue 2 - Demand***

- ***A limited understanding of demands placed on the Branch***

The inability to understand demands that enter PSB and the resultant resources allocated to meet this demand have resulted in a service unable to effectively deliver excellent service in police complaints handling.

There are several mechanisms for demand to enter PSB and as such there is no focused resource dedicated handle these demands appropriately. As a consequence of not considering the work as an end-to-end process, and instead focusing on sub-optimisation, results in an inadequate response to complaints and those subject to allegations of misconduct.

The main areas of demand within the PSB are;

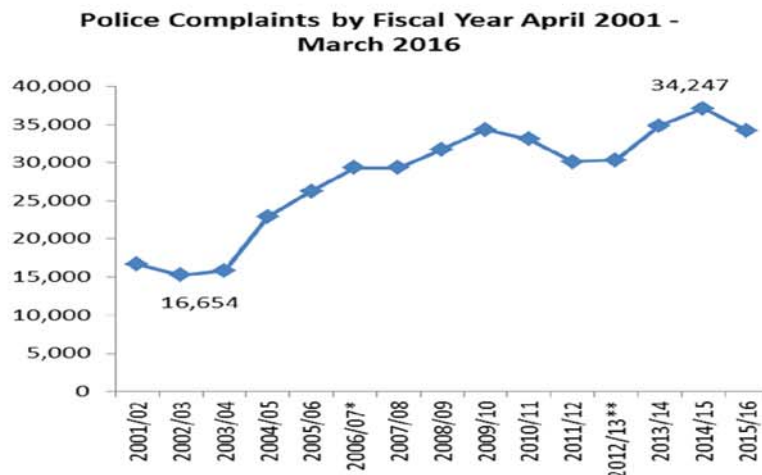
- Public Complaints (Y files)
- Internal Misconduct (YD files)
- Miscellaneous matters (YMC files)
- Direction and Control (YP files - Policy Complaints)
- Independent IPCC investigations (where there is a PSB SPOC)

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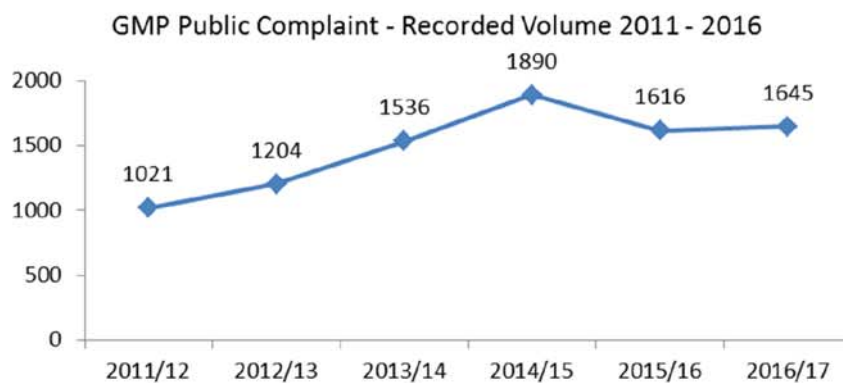


- Appeals
- Police Contact Deaths/Coronial Matters
- Organisational Learning submissions
- Assessment and Misconduct - Hearings for Officers
- Business Interests (in particular now that police staff is included)
- OPCC/Mayor's office – central function to coordinate responses for dissatisfaction and complaints.

As per the table below, police complaints nationally have doubled since 2001. There are a multitude of factors that contribute to this rise, among them are policy changes in the recording of complaints, alongside greater potential avenues to submit and encourage complaints, particular crime type's i.e. historic sexual abuse/assaults and an acknowledgement that greater dissatisfaction with policing services exist, more recently in view of provision of policing services during a time of austerity.



Public Complaint levels have experienced a rise in years prior to 2016, at which point the Branch has, although seen a plateau in demand levels, has experienced a greater level of scrutiny and expectation around quality and integrity. The Policing & Crime Bill 2018 will have a direct effect on demand as all complaints, at all levels, will by necessity have to be formally recorded, removing the ability to reject complaints upon receipt (dependant on qualifying factors).



Home Office consultation during the development of Part 2 Policing Crime Bill 2018 highlighted;

*“Public Engagement / Satisfaction: In 2013/14, 87% of people who expressed that they had been dissatisfied with the police in the previous five years chose not to complain. 72% of those who did complain were dissatisfied with how their complaint was handled”.*

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Greater demands are evidently at risk of entering the complaints system as a consequence of creating and encouraging police complaint and dissatisfaction.

Further amendments to Poling & Crime 2018 outline potential more demand to enter PSB through;

*“A system of policing super-complaints will allow organisations, such as charities and advocacy groups, to raise issues on behalf of the public about patterns or trends in policing that could undermine legitimacy. At present such groups have no official route for raising systemic issues.*

*The primary purpose of the system is to capture national or cross-force issues that are not otherwise captured by the existing complaints system, IPCC investigations or HMIC inspections.*

*Super-complaints systems already exist for the financial services sector and for consumer protection”.*

The IPCC

The changing stature and nature of the IPCC role in investigations has seen greater involvement and influence of this body. As such the IPCC workload has increased for independent and managed investigations. Further changes to the terminology for Methods of Investigation will see the IPCC operate an ‘Independent’ or ‘Directed’ investigation. Service of the activities within these investigations are not envisaged to lighten the workload of PSB staff based on the current demand picture.

During 2015, 26 investigations were independent or managed, rising to 39 in 2016. At current rates, investigations are currently running at around 3-5 per month. Currently, in total there are 54 open cases and 32 reports requiring action, with meaningful action required on 80 cases at any one time.

The workload continues to have a direct impact on workload of internal staff, with collation of information and logistical arrangements around the investigative and some decision making processes still within the remit of PSBi.

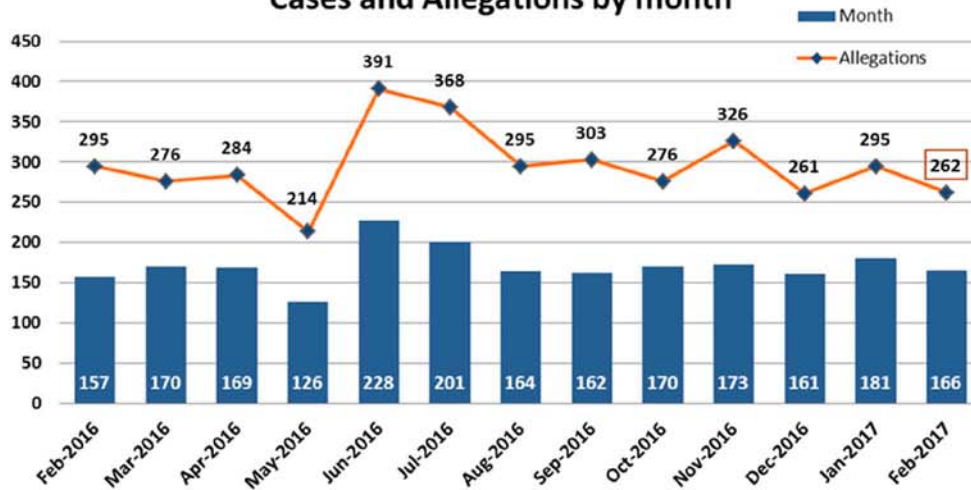
The Coronial team within PSBi was set up in 2012 following increased demand and scrutiny from HM Coroners over the timeliness and quality of investigations into Police Contact Deaths. The Investigating Officers work with Legal services on the preparation, disclosure of information and witness conferences prior to and during Inquests or Public Inquiry.

**S31** Due to a national increase in CSE investigations [REDACTED] and historic sexual abuse cases this has had an effect on the number of people committing suicide that have had some intervention or contact from the police.

The number of Police Contact deaths has increased substantially over the last 5 years. Between January – September 2016 the team have dealt with 31 deaths, attended 14 Inquests, 18 pre-inquests and 4 witness conferences which have defined 5 Regulation 28s (recommendations requiring action).

Annually PSBi receive around 2000-2200 complaints recorded under public complaint or internal misconduct matters. For each of these, there is predictably around 2-3 allegations requiring decisions on and subsequent investigation.

## Cases and Allegations by month



Further demand, which does not sit within the qualifying criteria for formal recordable complaints, but does require police action and are disseminated by PSB to relevant departments in GMP are defined as 'service recovery' issues. This demand is not readily recorded but can be estimated at around 1500-1600 items per year. PSB identifies the applicable business area to provide the necessary response.

60-65% of complaints are sent to division for Local Resolution and are subject to varying quality in investigation and response due to the varying approach in how divisions prioritise, manage and respond to complaints.

Approximately 35% of demand is retained by the Branch for Local Investigation. This equates to around 700 – 800 investigations per year. The below table highlights the predominant demands at each stage of the flow of complaints/misconduct handling.

PSB Demand at Entry		Initially Assessment of Demand	Investigations	Assessment	Outcomes
Referrals	124	<b>700+</b> cases retained annually  <b>2100+</b> officers subject to investigation annually Internal Conduct - <b>350</b> cases Ave. <b>2</b> allegations per complaint Ave <b>2</b> officers / <b>2</b> witnesses / <b>1</b> complainant  <i>Volume Initially Assessed as:</i> Gross Misconduct = <b>133</b> Misconduct = <b>59</b> UPP = <b>10</b>	Ave <b>17/18</b> cases per Investigator at any one time	Special Case Hearing = <b>3</b>	<b>6</b> - Dismissal
Career Breaks/Leavers	520		<b>24%</b> Withdrawn / Disapplied / Discontinued	Hearing = <b>14</b>	<b>5</b> - Final Written Warning
Business Interests (initial / review)	1492		<b>28%</b> excessive force <b>12%</b> off duty criminal <b>9%</b> fail to take action <b>7%</b> DSI	Meeting = <b>11</b>	<b>6</b> - Written Warning
Complaint Records (inc Conduct)	2027		Coronial Death - <b>30+</b> rising	UPP = <b>25</b>	<b>4</b> - Not Proven
Service Recovery	1570		IPCC - <b>3</b> per month rising	MA - Misconduct = <b>101</b>	<b>1</b> - Recused
Non Records	149	<b>65%</b> for completion by division <b>1300+</b> complaints varying quality in response		MA - Not Misc. = <b>33</b>	<b>1</b> - Stop - Legal Argument
				No Action = <b>89</b>	<b>1</b> - Management Action

In 2016 PSBi identified 935 officers who were subject to complaints and the investigative process (PSBi Local Investigations. This does not include officers subject to local resolutions).

89 officers were restricted, and on restricted duties for an average of 171 days whilst a further 9 officers were suspended for an average of 182 days.

There are currently (June 2017) 310 live investigations, with a further 335 outstanding on division (local resolution). Branch Investigators carry on average 16-20 cases at any one time. During the review conducted by John Armstrong (2015/16) it was stated that "an investigators ability to effectively manage misconduct caseloads diminishes after 10 cases per officer".

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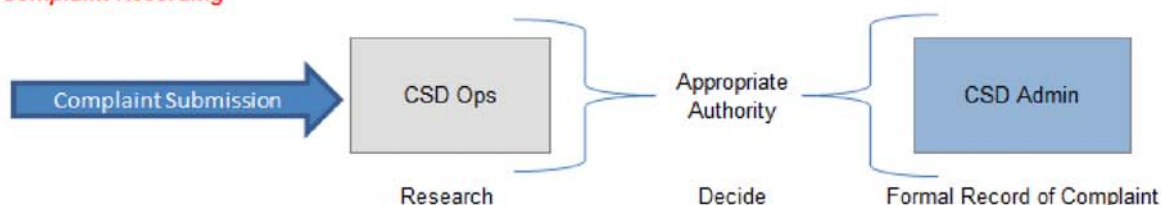
Branch Investigators, despite a continual uplift in strength numbers (approved in the past through TRG process), **(21 FTE on strength / 16 FTE on establishment)**, struggle to maintain an effective service to investigations and comply with the legal requirement to update the complainant every 28 days. This is a key requirement that features in HMIC Effectiveness inspection questions when assessing standards of complainant involvement and engagement with the investigation process.

Although there has been a concerted drive to reduce the backlog and timeliness of investigations, 45% of the current live 310 investigations are over 6 months old and highlight the capacity of the current system to service demand in a timely and efficient manner.

#### **Issue 4 – The Customer Service Desk**

- No complainant focus - Complainants do not receive any contact about their complaint other than an acknowledgement letter; even when the complaint is not fully understood.
- Work processes are sub-optimised in silo'd units within the service desk business –Admin & Ops - Queues evident leading to complaints not being recorded or allocated for 7-10 days.
- Lack of dedicated staff for handling recording processes
- Legislation drives activity– lack of innovation in how to allocate demand to resources available – decision-making demand filtered through bottleneck (1 individual to process legislative decisions)
- Limited resilience – individual roles with sole responsibility for particular demand types creates backlogs and poor response times to business interests, appeals, complaints.

#### **Complaint Recording**



The 'front-door' to PSB for complaints is via the CSD Operations unit, who process incoming submissions of complaint. The purpose at this stage is to decide either if the 'complaint' can be sent to division for resolution or gather enough information to enable the PSB Complaint Manager to make a Recording Decision, as per the legislative requirement to formally record a public complaint or provide reasons as to why it does not meet the requirement of a complaint, or 'non-record'.

*The focus of the CSD Ops team is 'processing' rather than the 'complainant'.* The capacity and capability of this team to work effectively to understand the nature of the complaint and the needs and expectations of the complainant is severely restricted. There is no capability or capacity to speak with complainants, to assess what a proportional response would be on very often, limited information.

Due to the size of the team the inbox is often full with many differing demand types and as such delays and backlogs exist, as of 6<sup>th</sup> April over 100 items were sat awaiting a response in the 'received' inbox.

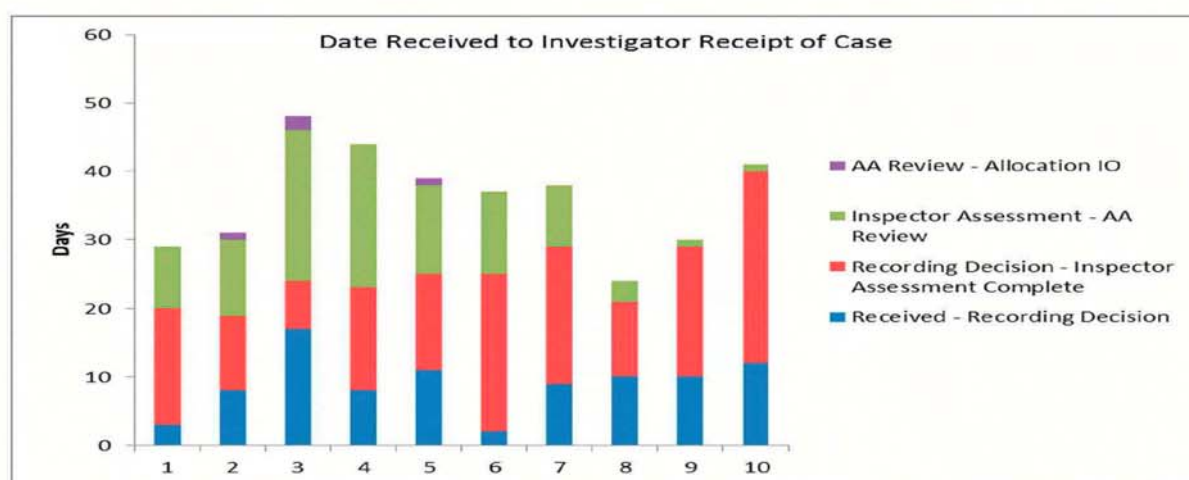
This presents problems when attempting to assess for potential threat, risk and harm as there is no effective way to process the volume of demand entering the system. Demand types can vary and have very real impact on the ability of team members to process the work. For example, referrals to the IPCC can take considerable time which limits the ability to process daily complaint demand.

The most prominent de-efficiency in the flow of work centres on the Complaints Manager. In legislation, a decision to record a complaint lies with the Appropriate Authority (Chief Inspector or Police Staff equivalent). As this is often 1 individual, all demand requiring a decision on the recording, or otherwise, of the complaint flows through a 'bottleneck' creating long delays of processing and administration.

Further delays are evident as the complaint, when the decision to record is made, is then passed into a SharePoint box for CSD Admin to formally record the complaint.

It is only at this point that formal date of recording is captured. Under legislation, complaints are required to be recorded in 10 days. The consequence of this is the Branch does not view the need to improve or maximise its potential to record sooner – *timeliness being identified one of the key requirements of any customer when making a complaint*, and that it's a 'good' enough service to complete within this time. The Branch currently averages around 7 days, although 17.3% of cases did not meet the deadline for recording within the legislative requirement with a 12 month period.

Dip samples of processing complaints times were tracked with the following outcomes; (graph below maps the key stages and times)



During the latter half of 2016, it took on average of 36 days from the date of receipt of a complaint for cases to reach an investigators desk, who depending on workload, will start to conduct investigation activities. The first month of activity or lack thereof, represents a lost opportunity to understand the needs and expectations of the complainant, [REDACTED] and seek earlier resolution at the point of complaint.

**Although the Branch has sought to internally reduce this processing time** by removing the need for an Inspector to complete an assessment prior to being allocated to an Investigator, there is still significant time lapse between receipts of complaints to the start of an investigation, around 15 days.

Up to 40% of the Customer Service Desk Admin Team is spent recording complaints on Webfocus (complaint database for capturing IPCC data requirements). This activity usually takes place days after the actual decision has been made to record.

The Admin team's current focus is narrowed to a particular area of the Branch work with other areas such as, misconduct logistical delivery of hearings and meetings left under-resourced.

There are also other 'front-doors' for demand to enter PSB. CSD Admin staff conduct career/leaver checks, an Appeals Officer process Business Interest applications/reviews, which are provided by individuals in Branch and offer no resilience in the service, and as such delays and backlogs are evident.

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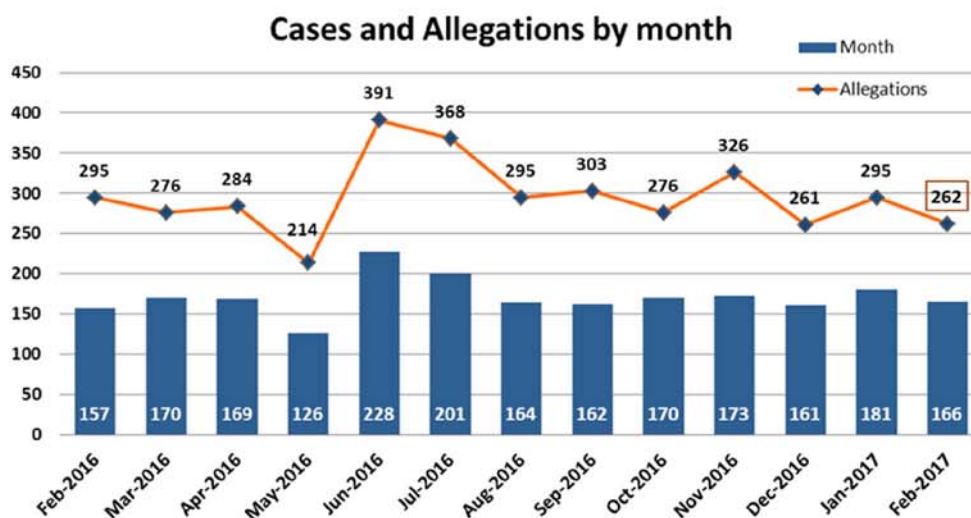
## Issue 5 – Investigations Capacity & Capability

PSB conduct investigations into approximately 35% of complaint demand in the form of Local Investigations. 65% are sent to division for Local Resolution.

35% equates to around 700-800 public complaint and internal misconduct investigations per year. The table below provides a breakdown of investigation types and proportions.

Type	Reviewed Volume	%
Excessive Force	170	28.57%
Off Duty Criminal	75	12.61%
Misc	62	10.42%
Failure to take Action	57	9.58%
DSI	41	6.89%
Data Protection	37	6.22%
Pervert Investigation	37	6.22%
<i>DSI - Death (Coronial Team)</i>	29	4.87%
Discrimination LR	27	4.54%
Incivility	16	2.69%
Sexual Predator	13	2.18%
Unlawful Arrest	12	2.02%
Property	11	1.85%
Custody	5	0.84%
Social Media	3	0.50%

Each of these investigations contains a number of allegations. Although each case could be described as ‘unique’ analysis can show that on average each investigation typically includes a complainant, witnesses in around 40%-60% of complaints, involves 1-2 officers and makes 2-3 allegations per officer. The below graph presents the longer term count of monthly files and allegations.



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### **5.1 Allocation of work**

The visibility of demand for investigations has been ineffective, exacerbated by a poor case management IT system. The distribution of work was based on a narrow view at 'team level' rather than Branch wide. As such an imbalance of workloads was evident, with particular investigators carrying excessive caseloads. The ability of the Branch to manage its demand was severely hampered by its inability to measure volumes and understand the make-up of the type of cases being conducted. Managing resources to meet the demands of potentially complex investigations has been a source of risk for the Branch. Excessive workloads prevent investigators from providing an effective investigation as they manage competing demands and are unable to develop effective relationships with the complainants and stakeholders involved in the complaint process.

### **5.2 Timeliness of Investigations**

PSBi have historically suffered with 'legacy' investigations which have taken significant Branch resources to mitigate, negotiate and resolve. At November 2015 around 80% of cases were classed as 'historic' requiring further investigation. These cases were concerned with investigations that were already 2 – 3 years old. It is only during early 2017 that the Branch is in position to deal with demand received during 2016 and as such only 10% of cases are 'legacy' cases requiring further investigation.

As such, the current processes, although subject to internal changes have left the Branch in a state of 'catch-up'. Investigations traditionally are lengthy processes, a proportion due to being in 'subjudice' (court process to be completed before internal investigations) or independently managed by the IPCC, whilst internally managed investigations are hampered by workloads of investigators who must balance competing activities for each investigation.

### **5.3 Special Requirements & Severity Assessments**

Legislation dictates the requirement to complete an initial 'severity' assessment and the need to consider special requirements to any officers involved as part of the complaint.

Historically PSBi have over-engineered this process, insulating the workload to individuals of rank (Sergeants or Inspectors to complete the assessments – neither without rationale as to why not the investigators) and provided no clear understanding around content and format required for making clear and concise decisions. Recent improvements have been incorporated into daily business, with Investigating Officers now responsible for completing these assessments. This has improved the flow of work through the system, improving timeliness, given responsibility to investigators at the start of investigations and increased the ability of staff to conduct these assessments through training, mentoring and feedback. This is an ongoing process of upskilling staff and will yield significant benefits for reducing the bottlenecks for assessment completions.

This essential assessment process has to pass through a significant bottleneck, with just two Chief Inspectors signing off the assessments. The role of Appropriate Authority is described in section 5.4

### **5.4 The Appropriate Authority Capacity**

The Appropriate Authority role is critical in the assessment of complaint and conduct matters. Currently the Branch operates with 1 Chief Superintendent, 1 Superintendent, 3 Chief Inspectors and a Complaints Manager (CI Police Staff equivalent). The principle demands are for completing decision-making for the;

- Recording of complaints
- Initial special requirement and severity assessments
- Final decisions in relation to Investigating Officer reports.

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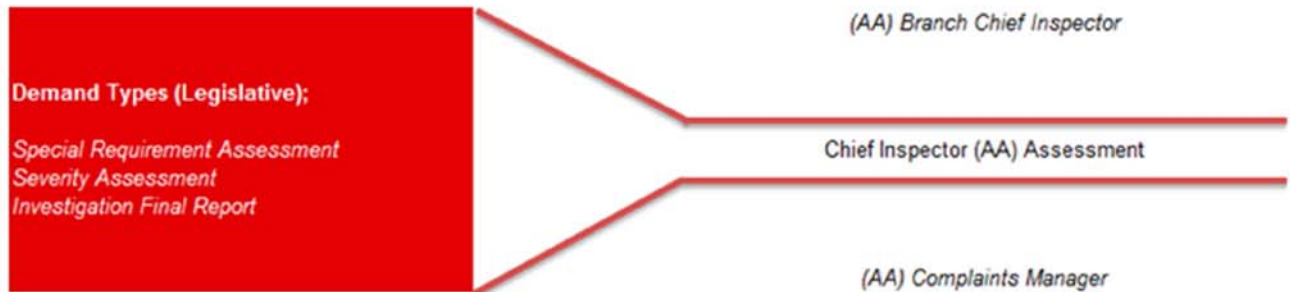
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- IPCC managed investigation reports

The Scheme of Delegation (see appendix) outlines decision making responsibility required by each rank. The PSBi does not currently maximise its resource at Chief Inspector level. Two Chief Inspectors undertake all assessment decisions, whilst the Complaints Manager only makes initial recording decisions. A further Chief Inspector, although has authority, is not involved in the legislative process, but picks up 'Branch' work, such as Freedom of Information requests and recruitment.

#### **Assessment & Decision Making in Special Requirements, Severity Assessments & IO Reports**



There was an observed lack of innovation to meet the challenges of the demand for decision making with processes that did not consider the impact of constraining the decision-making to a smaller group of staff than is available. There has been no thinking in terms of duty rota, or a clinic/triage for decision-making amongst the Appropriate Authority to improve the flow of work through the investigation stages.

### **5.5 Performance**

During 2015/16 the average investigation length for a full investigation was 241 days. Data collated shows that even cases that are Dis-applied, Discontinued or Withdrawn are on average anywhere between 107 – 252 days in length. The impact of this can be measured in working days lost and pay of officers subject to investigations;

***89 officers restricted over 10337 working days = minimum £1.9m in pay whilst restricted***  
***9 officers suspended for average of 1099 working days = minimum £212k in pay whilst suspended.***

The system currently in operation places no emphasis in reducing this impact to the force, due to its current capacity to manage this demand effectively and in a timely manner.

The London School of Economics, as part of its overarching study into GMP sickness during the period 2008-2013 found those officers subject to investigation and serving of papers were up to 40% more likely to report sick. The impact of lengthy investigation subjects officers to potentially prolonged periods of stress and anxiety during these periods which has an effect on their place of work and ability to maintain focus.

### **5.6 Inconsistent standards for recording and tracking of strategy, actions taken and decisions made throughout the recording and investigation process**

*IPCC Guidance;*

*"We are aware of one professional standards department (PSD) that has produced a checklist for investigating complaints and conduct matters. This reminds the IO, not only about what should happen as part of the investigation, but about how it should happen, how it should be recorded, and how it should be explained to the complainant".*

One of the key findings of the peer and previously commissioned PSBi reviews focused on compliance and lack of systemic and auditable process for recording decisions and tracing the thinking and actions of investigators.

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There have been inconsistent standards in operation across the investigation process. Investigators have individual methods for working and recording work, most developed in line with colleagues on their team in view of the lack of clarity offered by the Branch.

Due to a perceived scrutiny on decisions, often any decision required as part of an investigation was proceeded by lengthy and time consuming reports, written as a form of justification, without any understanding of what is actually required. This confusion and lack of clarity resulted in more work, much of it wasted. Although much work has been undertaken to improve consistency and CPD sessions with investigators are now routinely held, more work is required to improve standards.

### ***5.7 Terms of Reference***

The terms of reference required to set the direction and justify the actions of the investigations are too broad and generic. Without a specific focus, this opens investigations up to potential areas not relevant to the allegations being investigated.

It also promotes the possibility of non-value work as investigators cover non-specific and inconsistent actions.

### ***5.8 Complexity in Severity Assessment / Special Requirements Process (Initial Assessments)***

Investigators have recently received training in conducting Initial Assessments which covers the basic legislative steps before the commencement of investigations. As such this role and function has previously been passed between ranks, both Inspector and Sergeant level to be completed before being passed to the investigation teams. In effect this approach was implemented to prevent errors but as a consequence investigators did not have ownership of the investigation 'end-to-end' and the lack of investment in Investigator's skills and abilities to complete this key step introduced another layer of checking and further delays in the process.

### ***5.9 Re-Assessment Applications***

At any point of an investigation, investigators can apply for the original gross misconduct/misconduct assessment to be re-assessed by an Appropriate Authority. Due to a lack of clarity around what information is required, lengthy reports were completed to justify a recommendation.

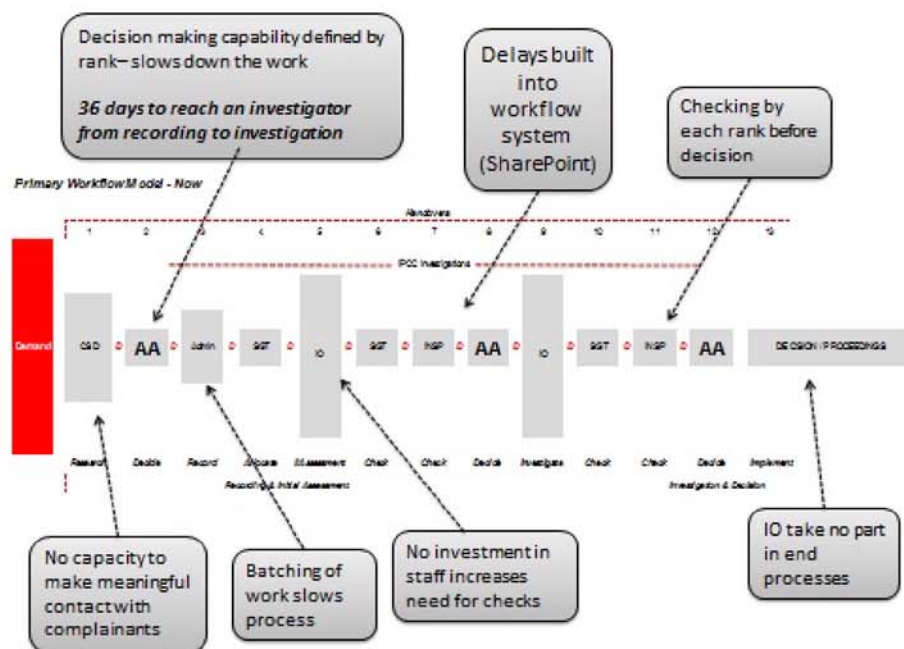
### ***5.91 Investigative Strategies***

There is no consistent strategy or set of policy documents that clearly outlines the strategy being deployed to undertake an investigation. This lack of auditable decision-making does not comply with a need to be transparent or evidence thinking within prescribed ethics set out within Policing, eg. Code of Ethics framework. CPD sessions have recently been a feature of the branch attempting to upskill staff in this area. The Branch has begun to instill this requirement in the preliminary stages of the investigative process.

### ***5.92 Workflow – handoffs and checking at each stage of the process***

The below high level flow diagram outlines the key steps that are undertaken at each stage. There are significant delays built up in points in the flow where individuals are seen as responsible for checking, but are not part of the legislation requirement for decision making (which lies with Chief Inspector or equivalent).





The Investigator role operates below the required level to provide an end-to-end service and ownership of a case due to a lack of investment and de-grading of responsibilities in key functions within the process. Despite this the investigators workload still lacks available capacity to conduct the work without completing identified gaps in the methods used for documenting investigative actions and decisions.

Historically the initial assessment process for an investigation has either involved Inspectors or Sergeants completing Severity Assessments and Special Requirement assessments. This has created a twofold issue. Firstly, this process relies on a small group of individuals and dramatically reduces the speed at which work flows through the system. Secondly, those who eventually investigate the case have not had to consider the initial assessment which drives the terms of reference and investigative parameters to conduct an investigation, and de-grade the feeling of ownership an investigator should have upon allocation of a case.

This is partly a cultural issue in a belief that the investigators cannot be trusted to complete this part of the process due to a lack of skills and abilities, which in part is due to a complete lack of investment in and upkeep training, CPD or mentoring.

A transition is currently underway to transfer responsibility to the Investigators to complete assessments and set terms of reference, which due to neglected training and mentoring plus a wide variation in qualifications of the investigative staff will provide significant cultural challenges for the Branch to release control and trust staff to own this work whilst delivering quality products, at which the Branch has no defined quality standards clearly and concisely understood by all staff. Any uplift in documentary standards would have a significant bearing on the required number of staff to complete the required process changes.

### **5.93 Investigating officers form a limited part of the hearing or meeting process**

Currently Investigators, on completion of an investigation and post submission of an Investigating Officers Report to an Appropriate Authority, play no further part in the process. In the event of a case to answer in relation to gross misconduct or misconduct, the Investigator does not attend or form part of the delivery of the hearing or meeting. Investigators have a very limited understanding of how their investigations proceed to and are used in hearings and meetings. This approach means investigators have a poor appreciation how a file should be formed and presented, how the content and format of their original investigative approach and activities can affect the

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delivery of a hearing or meeting and create potential issues for GMP in bringing effective cases without the need for the Assessment & Misconduct officer/legal department to identify potential legal issues and rectify errors in the collection of, for instance statements and written accounts from officers and complainants.

#### ***5.94 Poor performance management – lack of understanding around performance issues results in lengthy investigations***

There has traditionally been a limited and narrow performance management framework, exacerbated by a weak IT system unable to deliver meaningful and timely information. Whilst it is clearly acknowledged that capacity and capability of investigations does have significant bearing on the length of investigations, the Branch currently has limited ability to understand how investigators are performing in relation to the type of cases that are being held. Effective turnaround of cases is further limited by Sergeants performing an ineffective case management review function.

Sergeants in control of the investigation teams are not delivering an effective case review function for investigators, partly due to the skills gaps in this area of work and partly due to differing qualification levels compared to staff. (i.e. a uniform sergeant conducting case review of qualified detectives' investigative actions). This is a skills gap identified by the Branch. This critical performance management role is currently being completed by 1 Detective Inspector. Poor case management exacerbates the already lengthy process of investigation as clear direction and decision making is required on an ad-hoc basis to maintain a focus on the investigation parameters and create an emphasis on the need to turnover cases in a timely manner.

#### ***Issue 6 – Decision-Making in 'Cases to Answer'.***

##### ***Consultation on case to answer***

Where a case to answer is evidenced in an Investigating Officer Report, the current decision making process involves a hand-off arrangement where the investigator provides a report, an Appropriate Authority makes a decision before providing the misconduct sergeant and Legal Services with notification to conduct a hearing or meeting. At present the input of each of these roles is delivered independently rather than on a collaborative basis. The decision maker is exposed to only a report but does not routinely have the input of the investigator or the misconduct office prior to the decision. This creates problems with file build quality as the investigator is never involved in the delivery of this function.

#### ***Issue 7 – Roles, Skills, Training & Recruitment***

- Training & CPD have been limited, reducing staff skills and abilities to perform core roles effectively
- Roles and responsibilities are not reflective of job descriptions and grading
- Responsibility for key tasks sit with key individuals which de-grades resilience in periods of absence
- Recruitment strategy – mixture of qualifications and training profiles for uniform, detective and civilian investigators has now produced staff with varying skill levels. As such the Branch has not previously operated a strategy that delivers against its expectations of investigative competence.

#### ***Issue 8 – IT & Case Management***

##### ***IT – SharePoint used as a 'case management' system, creating delays in processing***

SharePoint is the principle workflow management system used by PSBi. Although designed as a document storage facility by GMP this has become the de-facto system of managing and sharing of work around the varying units

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within PSBi. Creation of varying inboxes has created confusion amongst staff whilst the system does not provide an effective flagging system for understanding when work drops into queue for further progress, updates or decisions.

As a result of this system and no case management IT solution, delays are an accepted part of circulating work through various inboxes.

*To note; PSB have submitted proposals for a case management system for Phase 2 of IOPs, which will be included in the prioritisation exercise for future software development within GMP.*

### **Issue 9 – Appeals**

#### **Varying divisional quality in complaint resolution results in appeals**

Divisions are sent around 60-65% of complaints for local resolution. The standard of complaint investigation provided by divisions is of varying quality. As such appeals are received in PSB which relate to the standards of investigation received by the complainant. During 01/04/15 & 31/03/16 appeals received ran at 18% (214), of which 21% are upheld due to poor quality investigations and the standard of outcome letters received by complaints post investigation. The ownership of these complaints are with divisional officers. Currently PSB internally plays a limited role in assisting with these complaints. Capacity of investigators to offer advice and guidance for divisional staff is limited by workloads.

Greater guidance is required to bring a consistent standard and approach to divisional complaint handling. Due to the arrangements currently in place and the revolving nature of staff picking up complaints, the standards are not consistent across the workforce. PSB currently view this demand as 'owned' by division and do not view any responsibility to the complainant, unless an appeal is made. There are no toolkits available for divisional staff to utilise and guide the approach and process for dealing with a complaint, however low level.

### **Issue 10 – Prevention & Education**

- Limited capacity and capability to learn, prevent and educate both internally for PSB to assist in reducing demand and GMP wide, to capture and disseminate learning around producing consistent standards, practise and procedures.
- PSB suffers from a perception of being the 'discipline' branch, not as the standard bearer for outlining professional standards and ethical behaviour.

Silo working has long been identified as an issue for a large organisation such the GMP. Individual instances of good and bad practice, and the learning that might be derived from these, tend to remain restricted to local contexts, geographically (on a particular Division), organisationally (within a particular business group) or temporally (limited to learning for individuals involved in a particular incident).

The default 'learning' model of the GMP is thus reactive, event driven, forgetful, and process bound: Something bad happens, existing ways of working are scrutinised through laborious bureaucratic escalating processes, some top-down changes may or may not be made, (adding to the regulatory burden), and the matter is considered 'solved', and filed...until the same events occur again, in another time or place.

Lacking is an element of reflection, of 'heuristics' - drawing larger lessons from the individual incident - operationalising these across the organisation - of making learning capture a proactive part of business-as-usual processes at all levels of the organisation; and of memory. Currently, only some specialised functions - e.g. firearms teams - incorporate practices such as meaningful debriefs designed to address this, albeit in a local, limited sense. Organisational learning requires cultural change (is cultural change) broader than this. Historically,

making learning general is difficult via these processes as each 'silo' is limited by its' own culture, language, issues, fixes, and horizons.

Extract from '*Learning leaders*'; blame, failure and learning – a chief officer perspective; (April 2017)

The Policing Vision 2025 recognises this issue and highlights a need for the police service to focus on; '*Developing our staff and working with our statutory regulators to define a better balance between personal accountability and a bureaucratic fear of making mistakes*' (NPCC 2016).

The below table presents a scoping summary of the varying review functions across GMP, outcomes and resource levels in evidence across the force.

Existing resource within the Review Bodies:

Branch	PSB	SCD	PPD	CJC	HR	ERP	Change	NCE	Total
Staff	7	6	4	5.5	9	4	1		36.5

General summary of Review Activity in 2016\* :

Branch	PSB	SCD	PPD	CJC	HR	ERP	Change	NCE	Total
Reviews		27	555						582
Recommendations	74					150			224
Reports	62				55	12			129
									1035

*\*based on available data*

Status of the Review functions:

Review Bodies	15
External	9
Internal	4
Mandatory	9

Review function with no obvious OL element:

Branch	Unit
NCE	Design for Security
CJ&C	RMU
CJ&C	Witness Care
CJ&C	Business Contracts

- *Statutory reviews including Public Enquiry representation/rule 9 statements*
- *Justice After Acquittal Review*
- *Victims Reviews*
- *Serious Case Reviews*
- *Domestic Homicide Reviews*
- *Vulnerable Adult Review*
- *Coroners*
- *MAPP*
- *Child Death Overview panels*

An Organisational Learning Board has recently been formed. Internally, PSB have 1 Inspector working on the co-ordination of potential learning opportunities. Effective collation, analysis, identification and learning delivery requires greater capability and capacity to deliver meaningful learning across the organisation.

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Recent scoping has identified where civil actions and employment tribunals have resulted in financial pay-outs for GMP;

- Claims for compensation for false imprisonment either through not having requisite suspicion or on more technical grounds
- Claims of police assault and trespass to property and person
- Claims that an employee/prisoner has been otherwise injured at the fault of GMP (including deaths)- i.e. negligence claims and breach of employer duties
- Claims alleging corruption within the police (such as malicious prosecution and misfeasance)
- Claims involving a police dog bite
- Claims that the police have damaged property- such as a forced entry, or lost and missing property
- Claims relating to RTA's
- Claims alleging a breach of the Human Rights Act
- Claims brought under the Equality Act and claims of bullying and harassment are a growth area in the industry in general
- Claims brought for misuse of Data (DPA claims) are also claims that we have found problematic recently
- Commonly alleged in claims that damages should be increased due to flaws in the handling of complaints (i.e. aggravated damages).

Through an improved sharing, collation and analysis of these trends can provide richer organisational learning opportunities that can result in having positive impact on financial penalties from actions against GMP, if a team is aligned to understanding and solving current issues.

### **Issue 11- Culture**

Allegations of corruption and investigation mishandling within PSB have taken their toll on the morale of staff within the Branch. With a perceived level of scrutiny due to the nature of the work, which often involves the IPCC, PCC, MPs, councillors and the media coupled a clear lack of operational consistency and clarity within the Branch, there has been an observable lack of team ethos and collaboration to instil greater understanding of the work and how best to organise itself to meet its demands.

There remains a perceptible adversarial feeling toward stakeholders and complainants by members within the Branch, an effect of feeling constantly under scrutiny for the investigations conducted.

The Branch do not view and evaluate the performance of the end to end process, or the inbox demand that contains potential risk, and so has been ineffective at identifying where to make change and instigate a better flow of work or allocate resources to deal with demand in a timely manner.

In a rank based organisation, with clear delegated legislative responsibilities, this has stifled innovative thinking around decision making, and isolated key responsibilities to individual staff which leaves staff either feeling neglected, undervalued or under great pressure of workloads.

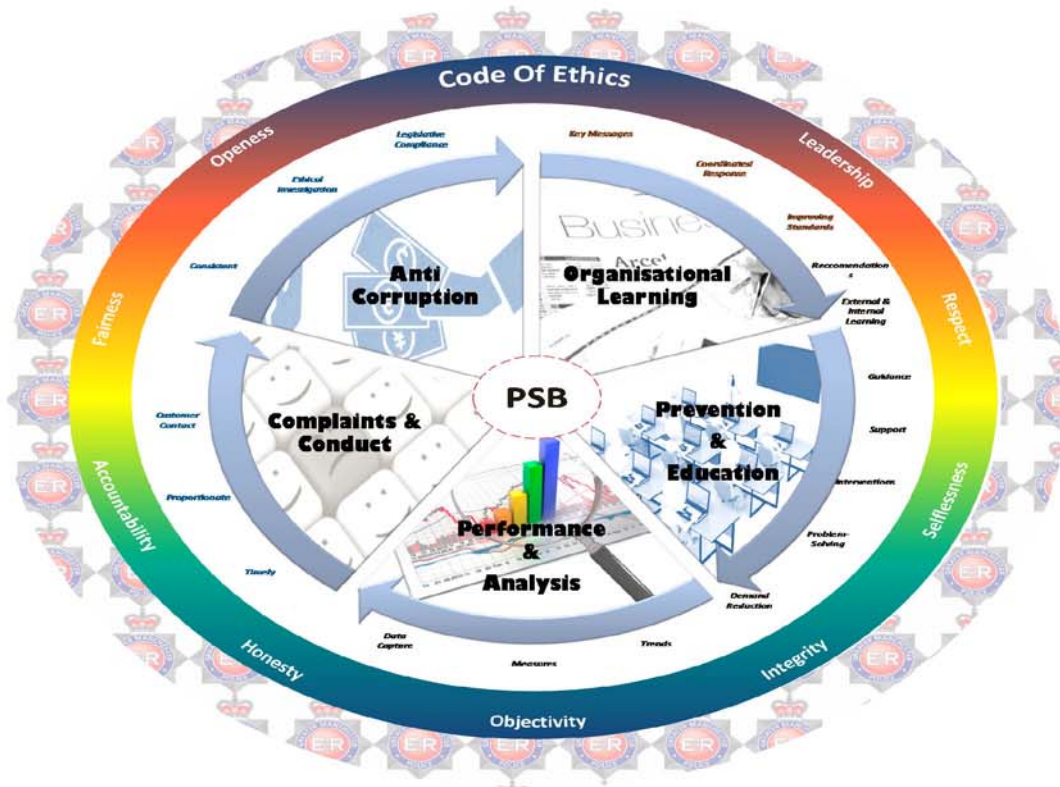
Job descriptions bear little resemblance to the work being conducted and leave certain staff carrying additional responsibilities.

There is a lack of trust in investigators due to the varying qualifications, skills and abilities of staff. Training is out of date and there is little observable mentoring and coaching to assist investigators in improving the quality of their work.

### Process & Organisational Structure (include the establishment and uplift figures)

The re-design of the PSBi has been based on a clear vision for the Branch, re-focusing and re-balancing with an Organisational Learning and Prevention and Education capability as well as enhancing the investigation arm regarding matters of complaints and conduct.

### Professional Standards – Visual Framework



Traditionally PSB has been viewed as the 'discipline' Branch, creating a perception amongst the workforce as purely focused on assessing wrong-doing rather than raising awareness, analyzing, identifying learning opportunities and improving and raising the professional standards of the workforce.



**Our Purpose and the Values which direct and inform our work**

The primary functions of PSB and underlying principles in the discharges of its responsibilities.

**Purpose**

The primary purpose of GMP's PSB is to:

- develop, maintain and promote the highest possible professional standards of conduct throughout GMP
- reduce and eliminate instances of risks to the integrity of the GMP
- identify and promote learning to achieve the highest possible standards of service

**Values**

GMP's PSB is committed to the values set out in the College of Policing's *Code of Ethics* which provides the framework for all the delivery of our services

We place particular importance on the values of:

- instilling and promoting a culture of integrity, fairness, transparency and impartiality
- engaging meaningfully and constructively with all our stakeholders

A defined set of operating principles to which all structural and process improvements have been aligned, have been agreed. These are;

- **Customer Focused**  
Capacity and capability available to make meaningful contact and form contracts with our complainants to identify and manage risk explore needs and manage expectations accordingly.
- **Timely**  
Provide an improve service for the processing of recording and investigations to enable quick results to complainants and reduce the impact on GMP officers
- **Proportionate**  
Establish expectations early, understand likely outcomes and establish a response that focuses only on valuable work and activities
- **Transparent**  
All work is recordable and auditable to ensure that clarity can be given during any point of a complaint procedure around decision-making and activity.
- **Ethical**  
The Code of Ethics is embedded in the culture of investigations and activities are recorded in such way as to display how investigations are conducted and decisions made.

**Change 1.0 – Creation of an Assessment Team**

**1.1 Summary of Change**

**Creation of 5 x E Grade Assessment Team Police Staff**

**Delegated legislative decision-making capability of point of receipt of complaint matter**

**Recording at point of contact**

A critical change required in PSB is a reengineering of the front end service provided at the point of receipt of complaints, conduct matters, business interests, referrals and enquiries.

Home Office Policy Intentions with new Policing & Crime Bill 2018;

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(Vers Sept 2016)

*The handling of complaints must be customer-focused, simple to understand and transparent throughout. Cases must be dealt with quickly and effectively, not just for the benefits of the public, but also for officers who have done nothing wrong.*

As outlined, PSB currently operates with a split Customer Service Desk function (Ops & Admin). Investing in the correct resource levels with the appropriate skills can transform how GMP interacts with and services demand in police complaints and misconduct matters.

The Assessment Team model is aligned to agreed operating principles which are designed to align activities undertaken with a clear understanding of its function and purpose.

#### **Purpose**

- Develop public confidence in the service
- Assist in maintaining the reputation of the Force
- Provide early identification of threat, harm and risk
- Providing an effective and efficient service to customers and stakeholders

#### **Principles**

- **Customer Focused** - Establish customer contact to understand desired outcome
- **Timely** - Resolve complaints at the earliest opportunity
- **Proportionate** - Appropriate allocation of work for a proportionate response
- **Managing Expectations** – Forming an agreement for what the Branch delivers to its users

#### **Desired outcomes**

- Improved customer relations and satisfaction
- Improved decision-making capacity and capability at point of contact
- Increased up-front resolution / only the right demand sent to investigators
- Consistent method of assessing, allocating and tracking demand
- Assist in reducing the time taken to investigate complaints

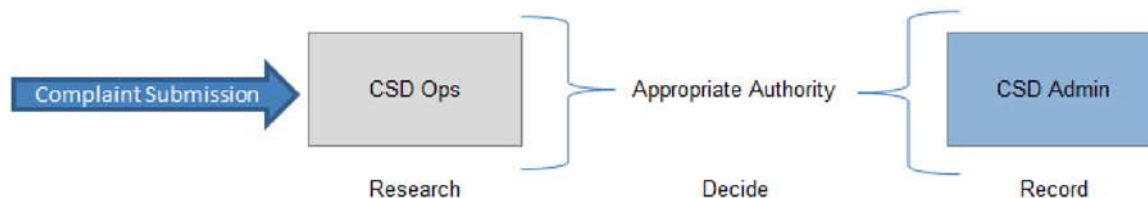
#### **1.2 Flow**

Critical to the functioning of the new Assessment Team will be the decision-making process around complaint recording.

As legislation dictates that an 'Appropriate Authority' (Chief Inspector or Equivalent) is required to make a recording decision, this affects the capability of the system to process work in a timely and efficient manner. The Assessment Team members, under the proposed model will have delegated responsibility of recording, with oversight provided by the Appropriate Authority.

The Appropriate Authority can delegate low level complaint matters to the Assessment Operatives but has at any stage the ability to remove highly sensitive, political, or those presenting with significant threat, risk or harm to take 'ownership' of these decisions.

### Current Workflow - High Level

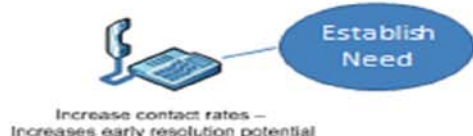


### Future Workflow - High Level



GMP has challenged the current legislation to ensure it works within statutory requirements but maximises its potential to create an improved workflow and better service to complainants.

## Decision-Making



"The Stat Guidance tries to replicate the regulations but we think there should be some flexibility within this so we think the key bit is to set up a process that has the appropriate oversight so the Appropriate Authority can have sign off of these decisions in some way but members of staff can do the actual recording and LR/LI suitability assessment when they are complete. Of course if a decision was made not to record a complaint then the verification from the AA should come in then." IPCC Guidance August 2016



### 1.3 Benefits of this approach

- Increase capacity to contact customers and provide the potential to reduce the work required in investigations;
- Improve decision-making capability and reduce batching of work to prevent bottlenecks and increase flow;
- Appropriate Authority is used 'on-pull' not a bottleneck in process
- Reduce wait for investigation start time from 36 day average to 2-3 days;
- Deliver a better product / package to stakeholders (i.e. divisions re Local Resolution)
- Improve resilience around key demands – Omni-competent staff trained to deal with multiple demand types

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## 1.4 Demand

A detailed assessment of predictable demand that currently has various entry points into PSB has been scoped and assessed to provide a full picture of demands on the new Assessment team;

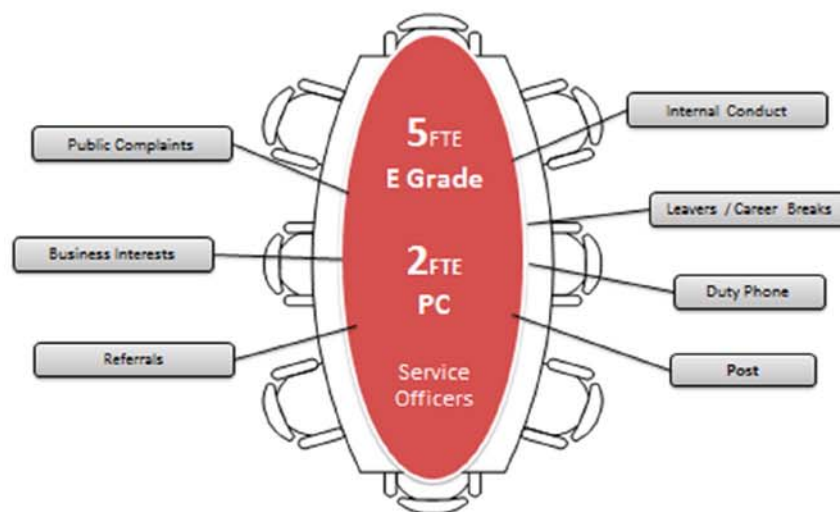
Type of demand	Volume
Calls to duty telephone	5340
Public Complaints	1864
Business Interests	1492
Internal conduct	351
Referrals	124
Postal enquiries	3560
Leavers, Breaks	520

The flow activities required to service each demand type has been mapped to understand capacity required to service each demand type effectively. Table 1.1(see appendix) outlines the demands and associated flow activities to ensure a complete understanding of capacity required. The Branch would expect an uplift of demand in business interests to reflect the requirement to assessment interests from both officers and staff. Until 2017, only interests held by officers have been required.

## 1.5 Roles & Responsibilities

The demand analysis and testing of this Assessment Team model has identified 7 FTE as the number of operatives required to deliver this enhanced service.

The 7 FTE are broken down into 5 FTE E Grade Police Staff and 2 PCs.



During testing of the Assessment Team model, key skills were identified to undertake the roles required. PCs provided an enhanced investigative understanding whilst the Police Staff had better processing skills and increased navigation skills for Force systems.

At this stage PSB identified that a combination of these both skills profiles are required to make up the Assessment Team. All Team members will be subject to training courses in legislation, customer service, internal systems, recording protocols and policy.

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## 1.6 Role Profile

### Core Purpose

Develop customer confidence and maintain the reputation of GMP through the provision of effective and efficient customer and process management

### Core Accountabilities

- **Customer Contact and management**
  1. Establishing early contact with the customer
  2. Agreeing a contract with customers, managing their expectations and agreeing outcomes;
  3. Resolving issues there and then where possible;
- **Process management**
  1. Collecting, recording and evaluating information;
  2. Identifying threat, harm and risk to prioritise decisions and actions;
  3. Making effective decisions around the recording and resolution of complaints;
  4. Maintaining complete and accurate records and systems;
  5. Delivering results in agreed timescales;
  6. Producing accurate, clear and timely handover documentation

### Core Skills

Active listening

Effective communication - including the ability to build rapport, challenge and probe

Ability to influence

PC literacy

Problem solving and decision making

Time management

Ability to organise and multi-task

### Personal Qualities

Patient, Empathetic, Tenacious, Resilient, Compassionate, Friendly, Confident, Quality and service orientated, Detail orientated

## 1.7 Training

The members of the Assessment Team would require the following systems training;

Training Requirements		Operative	Sgt
PSB Course ( cost + DSI)		x	x
Customer Service		x	x
Communications Skills		x	x
Equality & Diversity (cost)		x	x
PNC		x	x
ICIS		x	x
NSPIS / iTrent		x	x
Conflict Resolution		x	x
Leadership Course			x
Process	Recording a Complaint	x	x
	Misconduct	x	x
	Careers / Leaver Checks	x	x
	Business Interests	x	x

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## 1.8 Benefits

- **Faster recording of complaints** – *within 48 hours not 6-10 days*
- **Empowered to make decisions** – *AA on pull not in process*
- **Improved capacity to identify THR early** – *today's demand today*
- **Enables greater focus on our customers and complaints**
- **Increases potential for earlier resolution and managing expectations through greater contact rates**
- **Enhanced ability to capture evidence earlier in process** – *resources in place to receive demand*
- **Improved handling speed from recording to investigation** – *from 36 days to 48 hours*
- **Assessment team members with clear role profiles** – *accountabilities*
- **Resilience to handle all demand types** – *eliminate reliance on an individual*
- **Staff Wellbeing** – *balancing demands across an established team*

## Change 2.0 – Uplift in Investigation Capacity & Improving Processes

### Purpose

- To provide a timely and proportionate response to the investigation of complaints and conduct matters on behalf of GMP, ensuring the highest ethical standards are maintained throughout the investigative process.

### Principles

- **Customer Focused** – meaningful customer contact throughout investigation, establishing a contract with our customers
- **Timely** – look for early opportunities for resolve complaints
- **Proportionate** response to complaint or conduct matter – clearly defined terms of reference
- **Ethical** – ensuring the Code of Ethics sit at the heart of the investigative process
- **Transparent** – auditable decision making processes and recording of rationale.

### Desired benefits & outcomes

- Improved customer relations and satisfaction
- Balanced allocation of workload
- Effective stakeholder management
- Delivering more timely investigations
- Clear and consistent documentary standards
- Concise and proportionate terms of reference for investigations
- Improved timeliness creates the conditions to capture any organisational learning closer to the point of the incident and make effect submissions or recommendations that could benefit GMP
- Improved support and advice to divisions for complaint handling

## 2.1 Improving Process

## 2.12 Summary of Changes

*Improved allocation of work through visible profile of live investigations*

*Consistent protocols in place to track and manage investigations with new product*

*Appropriate Authority decision making capacity widened to meet demands*

*Collaborative approach to decision making in cases to answer – improving and ensuring quality from outset of decision*

*Increased training and mentoring of staff to reduce checking processes*

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### 2.13 Allocation of Work

The allocation of complaints and conduct matters in current practise relies on an individual to consider the distribution of cases to investigations.

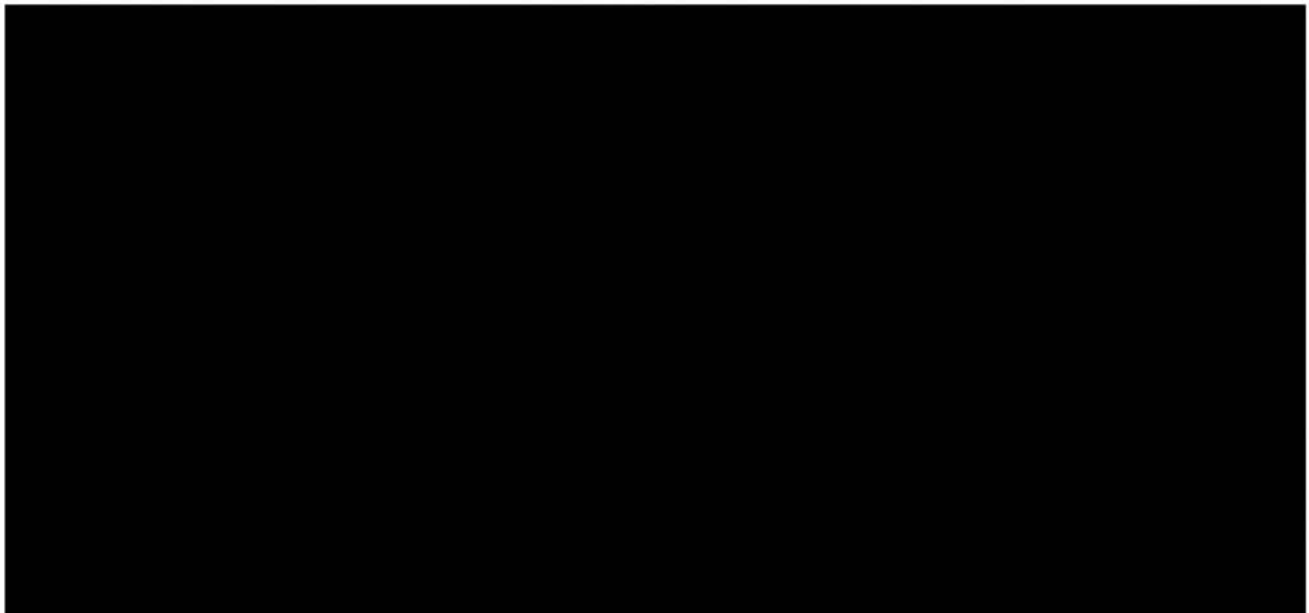
This approach has limitations for ensuring the workload is fairly distributed, fails to identify the investigator with the right skills and provides no resilience in the allocation process.

The Allocation Tool has been designed to capture a profile of caseloads for all staff to enable a better understanding of demand and current workload. Built into the tool is the ability to record investigators current skills profile to provide a deeper understanding abilities, training and CPD conducted to ensure the person with the right skills conducts the appropriate investigations.

The tool also allows more effective case management by ensuring that cases are highlighted dependent on case length. Indicators have been designed into the tool, currently set at 90+ days and 180+ days as triggers for case management reviews by Sgts.

This tool is owned by the Sgts on the Investigation teams, who responsibility it is to monitor workloads and allocate cases based on current demands.

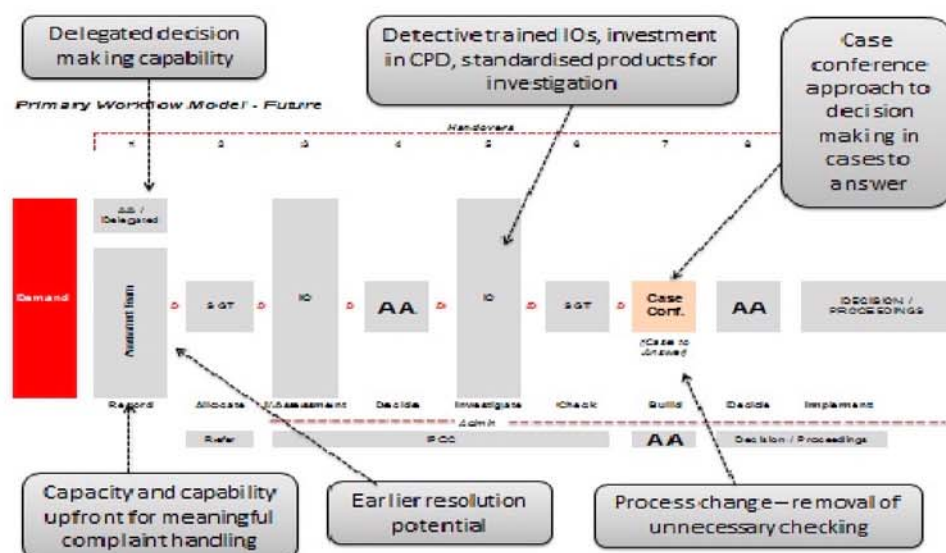
The Investigation manager is responsible for Investigator training and CPD and will keep the Investigator profile page up to date with latest qualifications, training and CPD.



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## 2.14 Flow



The flow of work will concentrate on limiting handoffs, reducing checking process and involving key people in the decision making processes.

To instigate this change will require a cultural shift which through improved recognition that training and mentoring needs of staff has to be prioritized, more effective collaboration of staff to process demand, greater understanding of demand, improved role profiles coupled with a more targeted and defined recruitment to begin the process of having the right people with the right skills occupy the right positions within the department.

## 2.15 Investigation Products

The investigative products have been created to provide a consistent and clear process for managing investigations, from of the point of receipt to delivery of a hearing or meeting in the misconduct process. For this the review has designed a *Complaint & Conduct Case Management Workbook*. This workbook is designed to capture the initial complaint information, strengthen the documentary standards of the investigations and enable better delivery of information to hearings and meetings, as required.

<b>Professional Standards Branch</b>		Case Ref:	<b>Y0001</b>
<i>Complaint &amp; Conduct Case Management Workbook</i>		Date:	<b>01/01/2017</b>
<b>Document</b>	<b>Actioned By</b>	<b>Authorised By</b>	
CSD Handover - Recording Decision	CSD	AA	
Complainant Contact Log	CSD / IO		
Officer Contact Log	IO		
IPCC Contact Sheet	IO		
Special Requirements & Severity Assessment	SGT	Consult AA	
Regulation Notice	IO		
Primary Investigation Strategy	IO / SGT		
Secondary Investigation Log	IO		
File Review - Notes	IO	SGT	
Reassessment Application - Guidance Document	IO	AA	
IO Report	IO	AA	
Misconduct Proceedings - Action Board	IO/AMU		
File Build - Submission to AMU	IO	AMU	

**Principles**

*Customer Focused*

*Timely*

*Proportionate*

*Ethical*

*Transparent*

## Product Descriptions

### IPPC Guidance

*"We are aware of one professional standards department (PSD) that has produced a checklist for investigating complaints and conduct matters. This reminds the IO, not only about what should happen as part of the investigation, but about how it should happen, how it should be recorded, and how it should be explained to the complainant".*

To ensure the PSBi delivery the above expectation, and improve on this expectation the following products have been design;

- *Assessment Team Handover Document*

This form is completed by CSD operatives and captures all relevant information at the submission of a complaint. Information includes reference numbers, priority actions, summary of the complaint, accused officer details, evidential information applicable to the complaint and the AA decision ratification. This is designed to contain required initial information ready to be submitted to the relevant investigator.

- *Complainant Contact Log*

The complainant contact log is completed initially by the Assessment Team operative to include any known details regarding the complainant, such as Interpreter needs, any known vulnerability, appropriate adult details and preferred contact methods.

This document is used to form the 'contract' with the customer detailing any actions and decisions agreed with the customer and ensuring a customer focused approach to maintaining meaningful contact with the customer.

The document is contained within the document set and maintenance will pass to the investigator who carries the investigation. Ongoing customer contacts will be recorded here for transparency.

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- *Officer Contact Log*

The document is designed to capture interactions with the officer/s involved in any complaints throughout the investigations process for purposes of clarity and consistency.

- *IPCC Contact Log*

Where contact is required with the IPCC, for the purposes of clarity and consistency, these contacts and subsequent actions are recorded and updated.

- *Special Requirements & Severity Assessment*

To comply with legislation the need to conduct Special Requirements and the Severity Assessment is essential within the process. A lack of clarity and consistency over the completion of this process required the need to formalise a form that considered all legal obligations but also *simplifying* the process. This form, to be completed by the Investigating Officer and submitted to the AA for approval, creates essentially a check form detailing disclosure, restrictions, regulation wording, rationale and complaint references and persons. This form is then sent to the accused officer and federation representative subject to the harm test. This ensures transparency and documentation of decision making at an early stage.

*IPCC Guidance;*

*"Clear and unambiguous terms of reference, drawn up and shared with the complainant at the beginning of the investigation, will help to ensure that the investigation addresses all the relevant issues and that all parties know what the investigation will, and will not, cover".*

By enabling the Investigator to complete this assessment process will deliver greater ownership and as a consequence a more focused Terms of Reference for the investigation.

- *Regulation Notice*

Regulatory notice to Officers involved in investigation.

- *Primary Investigation Strategy*

This document has been designed using known Investigative products utilised in other areas of investigation. This is a new document aimed at clarifying expectations for investigators around the primary considerations to set the investigative approach and subsequent relevant actions.

- *Secondary Investigation Strategy*

This replaces the inconsistent approach currently used to record ongoing activities within investigations; with a log to be adopted by all investigators capturing subsequent actions undertaken after the primary strategy document has been completed.

- *File Review*

This document simplifies the case management process. Supervision has the ability to review, create and log actions relevant for the investigator and the key dates for any decisions taken.

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- *Re-Assessment Application*

To clarify and ensure consistency this form includes all the necessary considerations prior to a submission to an Appropriate Authority for a decision regarding any changes to the Initial Assessment for gross misconduct / misconduct.

- *Investigating Officer Report*

Final report which contains terms of reference captured in the initial assessment stage, summary of complaint, presentation of evidence, conclusions and Regulation 21 wording.

- *Misconduct Action Board*

At the stage of hearing or meeting, post investigation, any actions required from within the Assessment and Misconduct Unit is recorded here for the investigator.

- *File Build Guidance*

This is a guidance document or 'check-list' of basic file preparation ready for submission to the AMU for a hearing or meeting.

## **2.2 Uplift in Capacity**

### **2.21 Summary of Changes**

- ***Uplift in investigator establishment to 24 (19 PCs / 5 Police Staff)\*\* to manage demands for;***

*Overt investigations into complaints / misconduct matters / coronial process*

*Improved complainant contact*

*Completion of new documentary process standards*

*Provide professional support to divisions in complaint process*

- ***Reconfigure Appropriate Authority roles to increase ability to manage decision making demands***
- ***Improved contribution and support to the organisational learning work with 1 FTE Sergeant post***
- ***Dis-establish 1 x Inspector + 1 x Sergeant – offset against increase in Investigator capacity requirements***

*\*\*Current Investigator strength = 16.6 DC/PC + 4.6 Grade G Police Staff = 21 staff, uplift of 3 on current branch structure.*

### **2.22 Method for understanding demand**

During the review, the Branch undertook a comprehensive and detailed analysis of the investigation types and associated activities.

700 case file narratives were reviewed, and re-assigned the typology to a more accurate reflection of the type of investigations that was undertaken by an investigator. The review team identified 15 predominate and predictable investigation types and were able to map the activities that would be associated and expected to fulfill the requirements of the investigations.

Analysis was conducted into timings to complete each activity by studying investigator completion times and then assessed the probability of particular activities occurring in each investigation, ie. Understanding on average how many interviews were conducted or statements taken based on dip sampling case files to reach a predictable volume of activities.

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### 2.23 Investigation Volume – Uplift in Investigators

The IPCC and HMIC focus on the quality of interaction of the investigations with the complaint. The ability of the PSB to make meaningful contact and develop relationships is hampered by the volume of caseloads.

During the originally commissioned review by John Armstrong, caseload capacity was identified at 10 per officer. At current levels the PSB are running with caseloads of 16-20 per investigator. 28 day updates to complainants are legislative obligations placed on investigators, and due to capacity are viewed internally as a requirement to be fulfilled rather than an opportunity to develop better relationships with complainants.

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PSBi Local Investigation; Case Type and Associated Activity Time					
Type	Reviewed Volume	%	Estimated Volume (Annual)	Hours per Investigation	Average per Investigation
Excessive Force	170	28.57%	220	7744.87	35.20
Off Duty Criminal	75	12.61%	88	3937.63	44.56
Misc.	62	10.42%	73	2085	28.54
Failure to take Action	57	9.58%	67	1323.46	19.71
DSI	41	6.89%	48	2469.96	51.13
Data Protection	37	6.22%	44	676.13	15.51
Pervert Investigation	37	6.22%	44	3314.7	76.04
<i>DSI - Death (Coronial Team)</i>	29	4.87%	34	2097.46	61.39
Discrimination LR	27	4.54%	32	846.21	26.60
Incivility	16	2.69%	19	555	29.44
Sexual Predator	13	2.18%	15	460.51	30.07
Unlawful Arrest	12	2.02%	14	437.27	30.93
Property	11	1.85%	13	222.42	17.16
Custody	5	0.84%	6	274.2	46.55
Social Media	3	0.50%	4	92.23	26.09
Total	595	100.00%	701	26537.05	37.86
				Admin Hrs	7315
				Total Hours	33852.05
				<b>24FTE</b>	

The establishment for Investigators in PSBi is 11 FTE, with a further 2 police officers FTE in the Coronial Team.

At current strength levels, the Branch is operating with 21 FTE Investigative staff (16.6 Police Officers & 4.6 Police Staff civilian investigators). 2 further Police Officers on strength with the Coronial Team.

The current establishment does in no way reflect the current work and demands within the Branch. To enable thorough and timely investigations, which would include expectations for competing the new standards in documenting investigations, the desire for the Branch to provide more support to the divisional complaint processing (around 1000-1200 complaints), greater interaction with complainants (home / preferred contact methods) and stakeholders whilst improving the activities undertaken within investigations

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increases the workload required within PSBi.

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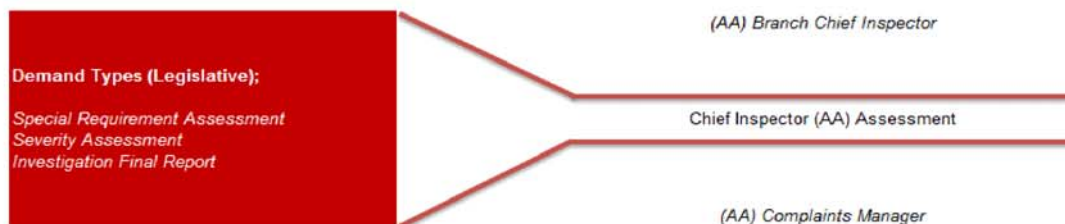
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The growth in Coronial work around Police Contact deaths and an internal desire for the team to formalize the Terms of Reference for Coronial matters to investigative complaints and misconduct often presents difficulties to balancing the varying nature of the work. At times officers are being investigated by the Coronial Team whilst also being supported through an Inquest. This challenge requires a shift in resources to be able to separate the two elements of the investigation with differing staff members, equating to a shift in resources from 2 FTE Pcs to 3 FTE PCs.

At current demand levels a requirement of 24FTE within the investigations teams, both complaints/conduct and coronial matters is required to fulfill the obligations and expectation placed upon it to provide a quality service.

## 2.24 Maximising Appropriate Authority resources

### AS IS - Assessment & Decision Making in Special Requirements, Severity Assessments & IO Reports



### TO BE - Assessment & Decision Making in Special Requirements, Severity Assessments & IO Reports



The branch currently contains three Chief Inspectors and one Complaints Manager. To engineer greater capacity to manage demand and decision making capability, the new process will include all roles with a requirement to complete Initial and Final assessments alongside recording decisions.

## 2.25 Training Plan / Requirements

Courses Required	External Cost
PSB	x
DSI	x
ICIDP	
PIP2 Initial	
T3 Witness	
T3 Suspect	
Disclosure	
Advanced Disclosure	
Inv Tutor	
Det Tutor	
Stop Search	
First Aid	
OST	
PO L3	
PNC	

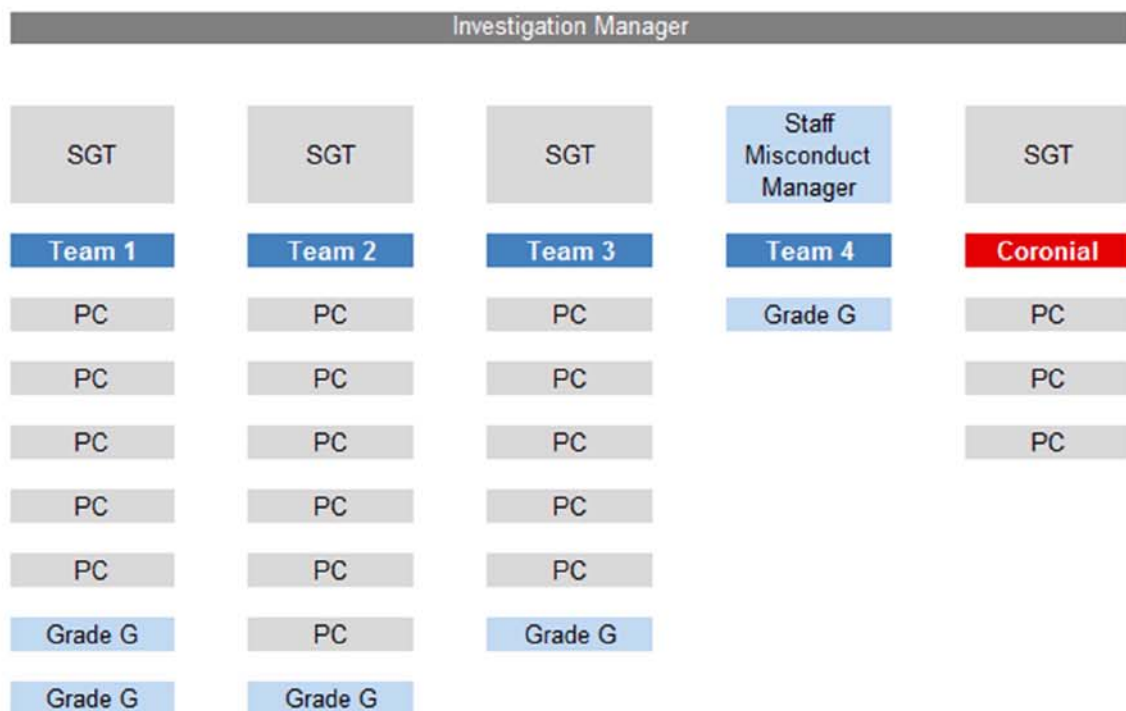
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## 2.26 Recruitment

A recruitment/replacement strategy is proposed to ensure that the branch secures the skills required to conduct investigations. As such, *detective trained and qualified* will be the essential criteria for future recruitment of investigators. Opportunity for current staff to complete ICIDP will be utilized where possible.

## 2.27 Investigation Team Structure



## 2.28 Outcomes/Benefits

- Clear structure in documented investigatory processes to deliver consistent practice = *greater commitment to transparency and auditable investigations*
- Increased capacity of investigators to;
  1. Complete 'Initial Assessment' process – *end to end ownership of cases*
  2. Complete approved documentary standards for investigations - *transparent*
  3. Establish greater connection to complainants - *satisfaction*
  4. Offer improved support to divisions in complaint handling – *consistent response to complainants*
  5. Form part of the decision making process in Cases to Answer
- Increased turnover of investigations to mitigate the effect of investigations on complaints and officers = *commitment to offering an improved service and response to PSB users*
- Deliver more timely decisions to officers and complainants = *greater satisfaction with service*
- Improved support to divisions in complaint handling process = *reduced appeals through more consistent response and resolution to cases*
- Clear line of responsibility and uplift in support to investigators = *improved wellbeing of staff*

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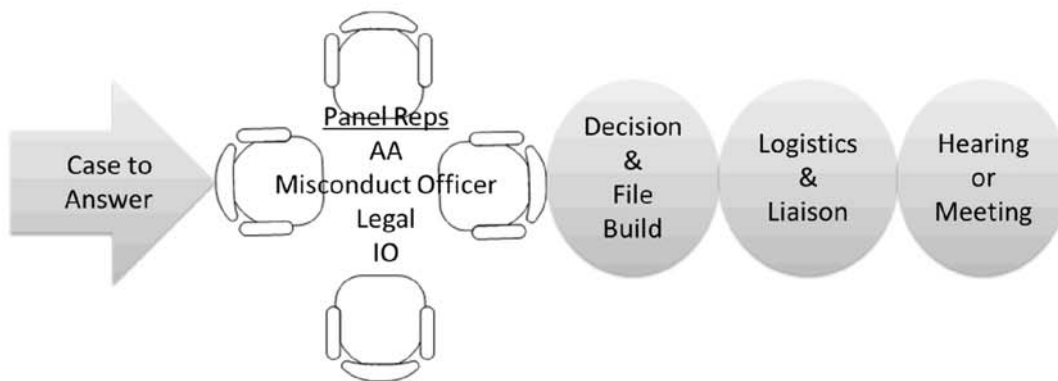
### 3.0 Misconduct Proceedings

#### 3.1 Structure

This will no longer be a 'stand-alone' unit but will combine expertise in contributing to decision making, leading the delivery of hearings or meetings and directing logistical staff in the required components to run effective processes.

As such the Branch Administration team, as outlined below, will assist in the delivery of hearing and meetings. This model builds resilience into this function, with multiple resources available to assist in logistical arrangements.

#### 3.2 Flow – Case to Answer



Decision-making in cases to answer will consist of an initial 'case-conference' with all required parties. Representations from Investigator's, Legal, misconduct officer in conjunction with the AA will improve the enhance capability of the AA to make sound decisions, being sighted on all considerations made by the panel. This has the ability to deliver better file preparation and delivery prior to the construction of a hearing or meeting, which are now conducted by legally qualified chairpersons. Mitigating mistakes in file build is essential before presentation of cases in the misconduct arena.

#### 3.3 Outcomes

- **Misconduct Expert no longer tasked with time-consuming logistical tasks**
- **Better focused on delivering expertise to decision makers (Appropriate Authority) early in process by collaborating with Legal support and Investigators.**
- **Reducing errors in file build and building quality into construction of files.**

### 4.0 Branch Admin

#### 4.1 Structure

The focus and structure of the admin function will be amended to better reflect the new requirements of PSBi. With recording of complaints being conducted within the new Assessment Team and the dissolving of the current Customer Service Desk Operations and Administration, the vision is for a new *Branch* admin, servicing the end to end process.

This unit will contain;

- Administration Supervisor – Grade E (This role was previously removed under Redland/Blueland and replaced by a Sergeant)
- Taped Interview Summariser – Grade C
- 6 x Admin Officers – Grade C\*

(\*The current Misconduct Admin Officer will be amalgamated into an Admin Officer role to provide greater Branch resilience to all admin functions).

The unit will be managed by a Senior Administration Officer (SAO). They will be responsible for delivering the work all the above roles currently do. Any work currently carried out by the Senior Customer Service Officer that cannot be delegated will be completed by the SAO.

#### **4.2 Tasks**

Tasks would include;

- The closing / finalising of files.
- Overseeing the weeding and archiving of files.
- Manage the property store and tape library.
- Supporting the preparation of files for meetings / hearings.
- Arranging misconduct meetings / hearings.
- Assisting with the running of misconduct meetings / hearings.
- Supervise and support attendees at misconduct meetings / hearings.
- Supporting the SAO with the management of the Branch's IT systems.
- Managing the office environment, equipment and related issues.
- Supporting investigators with administrative tasks such as: photocopying, scanning, typing and the like.
- Managing the officer diary.
- Supporting the taped interview summariser.
- Management of DMS mail and exceptions
- Managing freedom of information request, receipt and allocation of work.

#### **4.3 Outcomes**

- **Greater focus on the needs of the Branch administration rather than purely recording**
- **Reviewed and updated role profiles to provide staff with clarity over tasks, responsibilities and line management.**

#### **5.0 Appeals**

##### **5.1 Structure**

1 x Appeals Officer – Grade J

2 x Service Recovery & Appeals Support – Grade C

##### **5.2 Tasks**

- Assessment suitable appeals on behalf of the Chief Constable
- Provide a liaison function on behalf of the PCC in relation to complaints and enquiries provided by the PCC requiring both, formal and informal, responses on behalf of GMP.

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### 5.3 Key Change in March 2018

- Model A (Mandatory): All PCCs will have a statutory responsibility for the performance of the local complaints system including as the appeal body for complaints currently heard by the Chief Constable.

There are 3 model options as part of the Police & Crime Bill 2018 that have a potential effect on the current PSB structure.

Model A, as outlined above, is the mandatory element of the Bill requiring all current appeals to the Chief Constable to be under the control of the PCC, the purpose for this was outlined in the consultation exercise by the Home Office;

**Home Office policy consultation – Independence:** *Many members of the public lack confidence in the ability of the police to deal with their complaints fairly. For example, Chief Constables are often the relevant appeal point for a complaint, which is sometimes perceived as an example of the police “marking their own homework”.*

Due to the current mayor elections, it will be the Mayor who will make a decision as to how this future arrangement will be provided; at time of writing this is unknown.

The existing structure, outlined above, would expect at this stage to see a transfer of the 3 established posts under TUPE to the Mayor’s office, or external provider, from the Chief Constable in March 2018. The roles may continue to operate within GMP buildings or from the HQ of the new Mayor. These roles would deal directly with appeals work and fall under the budget of the Office of Mayor. TUPE arrangements would remain for people currently in post within the appeals function, regardless of transfer to Mayor’s office, or any other nominated external provider.

*Assumption;* Appeals Officer x J Grade and 2 x Appeals Support Officers x C Grade are currently on temporary contract with GMP. It would be an assumption that as of April 2018, these roles will no longer be within GMP establishment.

### 5.0 Organisational Learning, Prevention & Education

#### 5.1 Structure

The structure of the Organisational Learning, Prevention and Education arm will incorporate the following roles;

- 1 x Inspector
- 1 x Sergeant
- 2 x Intelligence Analyst
- 1 x Management Information Officer

#### 5.2 Tasks

- Establish connections with Force review functions
- Provide submission function for any organisational learning identified in force
- Horizon scanning for Policing issues
- SharePoint logging system – create databank of recommendations, reviews and responses
- Key word search function for analysis

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- Production of performance management statistics
- Undertake problem profile analysis
- Strategic Assessments
- Design training methods and interventions for staff
- Inputs to staff
- Report to the Organisational Learning Board

### 5.3 Evidence

#### Specialist Operations – Tactical dog handlers

The PSB & IPCC identifying concerns over the amount of independent investigations becoming necessary following a dog bite. Between September 2015 and September 2016 there was 21 submissions to the IPCC resulting in 11 independent investigations (some still ongoing). Prevention and Education sought to understand the force, regional and national picture to gain context. A package was devised and delivered to handlers which focused on a number of areas:

- History of Dog Unit
- Gauging reasons from Handlers/PSB/IPCC as to what issues were and what solutions could be
- Bespoke presentation to all tactical dog handlers
- Focus on NDM, statement writing & Body Worn Video
- Devising new template dog bite form to establish consistent approach for administration
- Quality assurance locally and at PSB of dog bite form and statements
- Supervisory and welfare support to handlers
- Good work capture and acknowledgement
- Social Media footprint
- Invitation to IPCC of work undertaken, presentation delivered and demonstration of handlers and dogs in action

22 members of the IPCC visited Hough End to view the work conducted by the Organisational learning Inspector.

*“It was helpful to get an insight into what PSB are doing in relation to training and support of officers and it helps us give a consistent message i.e. the more information you give from the beginning, the more likely it is to negate a full investigation or the need to serve Regulation 16 notices. I also thought the new dog bite report looked very thorough and effective”.*

### 5.4 Benefits

- Adaptive and capable of altering functions and departments within GMP in response to poor performance or changes in the work environment
- Central corporate memory of force wide learning
- Central monitoring/analysis point capable of proactively detecting emergent patterns and trends
- Facilitating the processing of raw recommendations into actionable learning, organisation wide for the wider and long term benefit of its employees
- Financial savings by preventing or mitigating litigation through proactive and innovative learning solutions
- Protecting and enhancing the organisational reputation of GMP by evidencing a willingness to be a learning organisation

Assist with;

- Address issues with Police Satisfaction, in Home Office consultation process: Police officers who are the subject of complaints also lack faith in the system, and are reluctant to engage in what they view as an adversarial process that focuses too narrowly on apportioning blame.

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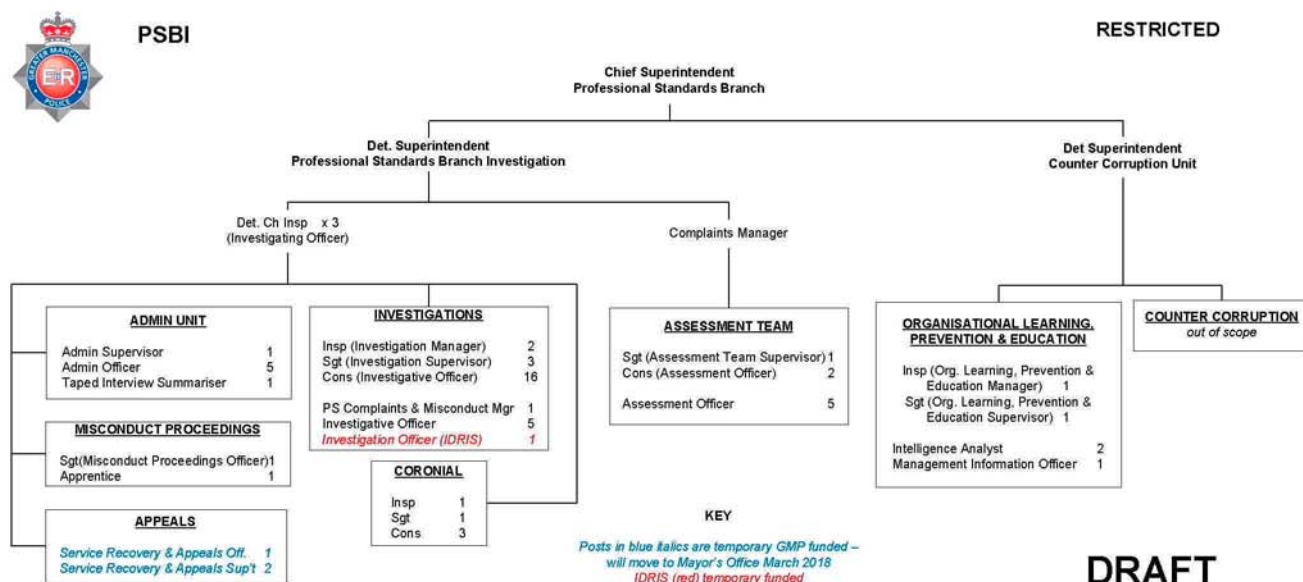


- Research shows effective organisations operating in conditions of complexity acquire the capability to identify potential high risk scenarios by examining and learning from historical events (Dekker and Woods 2010).
- Neither prosecution nor misconduct sanctions are likely to deter failure but they do contribute to greater risk adversity, defensive practice and mutual trust. Instead, organisations should seek to engage members in change by championing a reconceived understanding of 'accountability' that reduces the emphasis on blame and creates opportunities for learning. (NPCC April 2017 – Learning Leaders).
- Recommendation 4 – Learning Leaders (NPCC April 2017) There is an imperative for the police service to understand both who, and what, are responsible when things go wrong, to identify circumstances where future failure becomes likely and develop strategies for threat mitigation, avoidance or recovery by emphasising the importance of forward-looking accountability

## 5.5 Outcomes

- Develop increased confidence of GMP officers to submit 'learning' for wider knowledge and improving service
- Reduced demand in complaints and misconduct through prevention and education
- Potential reinvestment/re-allocation of investigative staff in line with complaints demand reduction in complaints/misconduct in the longer-term
- Centralised memory of identifiable organisational learning through received reports, recommendations and investigation results.

## 6. PSBi Proposed New Branch Structure



### Staff in Scope of Changes -

Job Descriptions for all staff and officers have been reviewed, amended in consultation with Branch members and for the following roles have been evaluated by HR evaluators for grading purposes;

- Complaints Manager (existing role Grade H) amended to Grade I
- Investigations Support Officers (existing role – Grade C) amended to Administration Support Officers (Grade C)
- Administration Supervisor (new role Grade E) – disestablish vacant Senior Investigations Support Officer (Grade D)
- Assessment Team Officers (new role – Grade E)

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- Analyst & Performance Manager – No change to JD but will have a Sergeant as a line manager as opposed to a Chief Inspector.
- Civilian Investigators – No change to JD but changes in team sizes and will go through CPD just like the DCs.

The role of Misconduct Support Officer will be amended to fall in line with the Administration Support Officers with no change in grade but subject to consultation.

All roles considered within scope due to job description review, evaluation, line management changes and structural changes to the overall delivery of Branch services. Informal consultation has been conducted throughout design phase with internal staff, HR, Federation and Unison.

<b>Organizational Structure:</b>			
Establishment Figure (Posts) of affected teams / units	53	Strength Figure (People) of affected teams / units	56.4

## 7. Technology/Equipment/Vehicles

Limited change required as part of this business case.

Equipment required detailed in below table for the operation of the Assessment Team/Investigations.

Equipment	Number	Cost	Total
Headsets	7	21.88	153.16
Desktop Monitors	5	119.13	595.65

<b>Training Costs</b>			
PSBI Course	5	500	2500
DSI Course	5	300	1500

## 8. Information & Data

### 8.1 Coding

Webfocus is the software used to record complaints, misconduct and death or serious injury matters. The IPCC require forces to record how many allegations, from a list of about 40, each complaint is made up of. GMP has, over the years, created a list of around 130 allegations rather than the IPCC's 40. This has led to overlapping, and over recording, of allegations.

Policing & Crime Bill 2018; Simplifying the system by removing the confusing categories for handling a complaint. (Schedule 5, Part 2)

PSB will greatly reduce the number of allegations in such a way to make recording easier, eliminate over recording but still allow for performance data to be produced.

### 8.2 Performance

- Volume or Complaints / Misconduct recorded
- Number of complainant contacts made
- Number of early resolutions
- Number/Type of allegations

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(Vers Sept 2016)

- Cases initially assessed as Gross Misconduct / Misconduct
- Restrictions – Volume and Length of Time
- Suspended – Volume and Length of time
- Time taken to record a complaint
- Length of investigation
- Time taken to make final assessment decision
- Time taken to set up a hearing / meeting from AA Decision
- Results from misconduct hearings / meetings
- Number of upheld appeals to the IPCC
- Number of upheld appeals to misconduct appeals tribunals
- Number of successful ETs connected to investigations
- Number of investigations carried by PSB staff

Does your solution involve the procurement of goods and / or services from an external supplier?

- ☐ Yes (please give details of the procurement routes that have been agreed)
- ☒ No

Has the procurement route and outcome been approved by the PGG?

*Required if contract value exceeds £50,000 over its lifetime or the PCC has indicated a particular interest. Contracts over £500,000 must go to PGG and the PCC Executive Board.*

☐ Yes Date of PGG meeting ..... ☒ Not applicable

What is the contract value?

Has the solution been approved by SDA

☐ Yes Date of meeting ..... ☒ Not applicable

*If your solution involves procurement of IS software, upgrades, licenses etc. please contact a Service Delivery Manager in IS Branch who will explain the requirement to fill in the 'Supplier and Contract' information from which can be found in the Investment Library.*

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### 3 WHO WILL BE AFFECTED AND HOW? (STAKEHOLDER ENGAGEMENT)

Customer / supplier/ other stakeholder	Interest / Influence Area												
	Resources	Equipment	Training	Law Changes	Process	Org Learning							
Establishment	X			X									
Finance	X	X	X										
Unison	X					X							
Federation	X					X							
HR	X					X							
Change	X	X	X	X	X	X							
Legal	X			X									
Estates		X											
IS		X											
Equality & Diversity	X		X										
OPCC	X			X	X	X							
OLWD			X										
Health & Safety		X											
Supts Assoc	X												
Procurement		X											

### 4 HOW WILL THIS HELP THE ORGANISATION? (STRATEGIC ALIGNMENT AND BENEFITS)

Commissioners Objectives	X	Expected Service Improvements
Tackling crime and anti-social behaviour		The PSB investigate criminal allegations against GMP staff, in a timely and consistent manner.
Putting victims at the centre	X	<p>Reports of crime and misconduct, committed by GMP staff, will continue to be made on-line, by telephone or at any police station.</p> <p>The assessment team will ensure first contact with complainants is within 2 days.</p> <p>Through this contact, the complainant's account of events will be fully understood before allocating the matter to an appropriate investigator that same day.</p> <p>The complainant will, therefore, not only have early contact with the assessment team, but with <i>their</i> investigator too.</p> <p>This will ensure a complainant knows very quickly the</p>

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		<p>name and contact details of the person investigating their complaint and, more importantly, how to contact them.</p> <p>The agreed method, and frequency, of contact with the complainant, as well as the actual instances of such contact, will be documented in a robust auditable way.</p> <p>This will ensure the PSB complies with the Code of Practice for Victims of Crime; complainants will be updated at every step of the investigation.</p> <p>Timely investigations will lead to complainants receiving outcomes faster.</p>
Protecting vulnerable people	X	<p>A current strategic objective for the PSB is to manage and prevent incidents of sexual predation by Police Officers and staff.</p> <p>This is one example of how PSB is involved in protecting vulnerable people; a matter that was recently highlighted in HMIC's Peel Report.</p> <p>Investigations into allegations of sexual predation will benefit from speedier investigations and, with a full branch of detectives, investigations that will have documentary standards that will stand up to scrutiny and oversight.</p> <p>The PSB's Prevent function will greatly assist in preventing such crimes and misconduct in the first place by providing well thought out inputs at key stages in officer's and staffs' career about relationships with members of the public.</p> <p>The uplift in resource in the Coronial team means more resources will support investigations into the deaths of those vulnerable people who die after contact with the police. The opportunity to learn from the conclusions of these investigations; especially with the larger Coronial team working hand in hand with the new organizational learning team.</p>
Dealing with terrorism, serious organised crime and maintaining public safety	X	<p>GMP's PSB provides a complaints and misconduct service to the North West Counter Terrorism Unit.</p> <p>As such, all the benefits GMP's divisions and branches will enjoy will be enjoyed by the NWCTU; specifically speedier investigations resulting in officers spending less time restricted.</p> <p>The NWCTU, given the vetting required to work in such an environment, cannot replace staff temporarily as quickly</p>

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		as other areas of policing.
Investing in and delivering high quality policing services	X	<p>Investigating complaints and misconduct is a service every police force must provide to the public.</p> <p>Speedier, better quality, investigations, and an increase in detectives, coupled with a more efficient use of management, will all ensure a higher quality service is delivered.</p> <p>The assessment team will record complaints far quicker than before and allocate them with 1 day of recording. These will be allocated to staff who, through an auditable process of continued professional development, will investigate to a high standard.</p> <p>A panel of experts supporting the Appropriate Authority will lead to more robust decision making based on a fuller understanding of the evidence and how the law (employment, misconduct and criminal) impacts on their decision.</p>
Building and strengthening partnerships	X	<p>The IPCC is the PSB's main partner.</p> <p>The new assessment team will refer all relevant matters to the IPCC and handle queries from them. This will lead to a close working relationship being developed between the assessment team and the IPCC's Method of Investigation unit.</p> <p>This will strengthen the, already positive, relationship GMP has with the IPCC.</p> <p>Through consistent standards and quicker investigations relationships with the Police Federations, and staff associations, will strengthen.</p>

#### Delivering Value for Money

- b) Explain any cashable costs / savings which will happen as a result (*Refer to Appendix D*)
- c) Explain any efficiency savings which will happen as a result (*Refer to Appendix D*)  
Other Improvements
- d) What other improvements might it bring?
- e) Is this an IT essential infrastructure up-grade, this is something that is essential to the operation of GMP e.g. server replacement, firewall upgrade? Speak to the IRG contact if you are unsure.  
☐ Yes  
☐ No

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Contact the PMO about the activity required in each stage. Please provide as much detail as possible about the remainder of the project. This should correspond to the milestone plan in the project workbook if being used.

Stage	Milestone/Activity	Estimated Duration	Time Constraints
<b>Construct</b> – <i>create all the different elements of the solution that will deliver the change. Establish baselines for benefits management. Test or pilot the solution. Train staff, if required and increase communications with customers. Plan for Go-Live by completing readiness assessment.</i>	<ol style="list-style-type: none"> <li>1. Amend Job descriptions/Role profiles.</li> <li>2. Consult staff, Unison and Federation.</li> <li>3. Develop a selection and appointment process for current staff for new posts.</li> <li>4. Advertise internally/externally for vacancies.</li> <li>5. Recruitment events</li> <li>6. Purchase additional IT screens</li> <li>7. Install new equipment.</li> <li>8. Ensure all required software is enabled on desktops/laptops.</li> <li>9. Set up internal training programme for both new and existing staff.</li> <li>10. Organise external training courses for new and upgraded staff.</li> <li>11. Agree and allocate Branch resources for internal mentoring of new staff – processes for recording complaints/conduct and business interests</li> <li>12. Communicate changes to internal and external customers.</li> <li>13. Design and agree new management structure.</li> <li>14. Agree design of office space.</li> </ol>	July-September 2017	<p>Staff consultation and notices.</p> <p>Unable to recruit staff with the right skills.</p>
<b>Implement</b> – <i>Support and handover the changes to the business area. Start measuring performance and benefits. Plan for project closure and End of Project report.</i>	<ol style="list-style-type: none"> <li>1. Establish performance measures.</li> <li>2. Monitor impact on service delivery.</li> <li>3. Review integration of assessment team.</li> <li>4. Review integration of J Grade Police Staff as Appropriate Authority</li> </ol>	October 2017	



**6.1 Roles required to deliver the project**

Resources Required	Grade	Days Required				Total
		Month 1	Month 2	Month 3	Month 4	
Project Manager	L	20	20	10	0	50
HR Support - Advisor	K	10	10	10		30
HR Support - Caseworker	G	10	5	5		20
PSB Inspector		20	20	20	10	70
PSB PC		5	2	1		8
PSB Police Staff	G	5	5	10		20

Please think about the roles, skills and experience you need on the project team and the number of days you will need them for. You will need to liaise with the business areas to make sure that any GMP resources are available and whether any backfill or contractor / consultancy posts are needed.

Please copy and paste the tables from the AppE People Resources tab in the financial workbook.

**6.2 Marker Information**

Please copy and paste the tables from the financial workbook 6.2 Markers

Markers are not applicable.

Is there anything happening now or that can be forecast which could threaten the success of your project (Risks and Issues)? What would be the impact of doing nothing? Have you made any assumptions (e.g. anything you are taking for granted)? Also list any links to other pieces of work that you know about that are happening across the force (Interdependencies). Refer to the relevant sections of the project workbook as relevant parts can be copied and pasted across (Change Branch staff).

**7.1. Risks** (something that may go wrong score 1 – 4 where 1 is low and 4 is high)

Risk	Impact	Prob. 1-4	Impact 1-4	Management Action	Owner
Mayor – 2018 A, B & C Model Options	High	1	4	Model A will be implemented in March 2018. Assumptions factored into this Business Case. Models B&C form part of a briefing paper being prepared by GMP/PCC to brief new Mayor of potential options. Full scoping and design of any potential service estimated between 2-3 years away.	Annette Anderson
Required training courses are not available to train new and existing staff within appropriate timescales to deliver improvements	High	3	3	Detective Inspector Investigations and Complaints Manager to have early consultation with training providers to secure courses in advance.	
Unable to recruit staff with the appropriate skills within the appropriate timescales	Low	2	4	HR to work with business leads to conduct a targeted recruitment campaign internally. HR and Unison to ensure appropriate skill matching from current staff.	DI Mark Radford
PSB investigators are abstracted from daily business to deal with ad-hoc matters. Recent examples include: The Grainger shooting health & safety prosecution / public enquiry, Operation Lamp (misconduct enquiry for another force).	This leads to staff at different ranks leaving the department temporarily. This leads to the daily business work they would have done being distributed to other staff. Ultimately this would lead to staff carrying a disproportionately high volume of work; something this business case is seeking to prevent.	3	4	When these cases are taken on by GMP / PSB, a careful assessment will be made to decide:  Which staff should work on the new piece of work?  How their daily business work will be handled.  This will include the following options (as some of which are done now):  Temporarily recruit police staff.  Temporarily promote internal staff, with the right skills, to cover management abstraction.	Chief Inspector with HR portfolio

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				Create secondment opportunities into the Branch from other divisions / departments.	

**7.2 Issues** (something that is negatively impacting the project now, score 1 – 4 where 1 is low and 4 is high)

S31

Issue	Impact	Impact 1-4	Management Action	Owner
IT – S Drive Access	Current data sheets used to capture demand provide inaccurate data	3	Branch to raise issue of spreadsheets not working on SharePoint. Access to PSB drive to house spreadsheets required by Branch being investigated.	Admin Supervisor
IT – PSB Drive dropping off machines	Investigators unable to access PSB drive for non-SharePoint work	3	Issue to be raised with IS. Currently aware of issue. Awaiting fix.	CI PSB
IT – SharePoint on Tablets	SharePoint on tablets would provide greater opportunity for Investigators to work agile.	1	SharePoint drop onto tablets due May '17.	GMP I.S
Loss of Staff members	Number of staff with key knowledge of branch diminishes day-to-day working knowledge within branch.	2	Job descriptions reviewed, re-written and evaluated to reflect requirements for future recruitment around Admin Supervisor and Management Information Officer.	PSB SLT

### 7.3 Assumptions

Describe any assumptions you are making e.g. anything you are taking for granted in the delivery of the project plan. This includes financial assumptions e.g. there will be a freeze on pay scales during the relevant period?

- Recruitment of Grade E Assessment Team staff. Any reduction in the number of posts vacant will decrease the operational quality outlined in section 2.
- HR support is assigned to the project to guide the consultation process.
- Assume that upon the mandatory change in ownership of the Chief Officer Appeals function would still provide demand into PSB and would require further assessment as part of future ownership requirement by Mayor's Office. Office of Mayor briefings designed and delivered.
- Demand levels remain stable as predicted in this business case
- There is sufficient capacity to commit internal staff to assist with the change process
- SharePoint will be provided as part of future 'drop' on Tablets to increased functionality – Investigators can take statements at point of contact with complainants.

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## 7.4 Interdependencies

As outlined in this business case, the Organisational learning function will have many interdependencies with the varying review functions and requirements contained within the Force review functions. It is not anticipated to effect resource numbers.

The Major Crime Review and statutory PPD reviews currently conducted from within the review teams with SCD and PPD, the Investigation & Safeguarding Review are proposing these function align under the Professional Standards Branch Chief Superintendent. As this will be a stand-alone function, this has effect of resource or capability requirements as outlined in this business case.

The following are “protected characteristics” under the Equality Act: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

At every stage of your project you must consider the equality impact. This means taking the following steps;

- Using appropriate evidence, consider the impact of the change on groups with a protected characteristic. Is that impact unique, disproportionate, negative or positive?
- If you identify a relevant impact, engage and take advice from relevant parties
- Consider what options there are for mitigating that impact, and
- Take appropriate mitigating action

You must do the above in relation to both;

- The impact on internal people (staff) – take advice from your HR support, who will be able to advise you who to engage with, e.g. the relevant Staff Support Network (s)
- The impact on external people (communities) – take advice from the Equality Team

Detail below the steps you have taken in relation to the above.

If it is decided that a change project has no equality impact, the full rationale for that decision should still be recorded below.

## 8. Equality and Diversity implications

This business case affects the following categories:

1. Assessment team Police Staff – There will be a selection process to match skills against the new posts. Staff will not be at risk of redundancy as there will be sufficient posts either within the Assessment Team subject to skills match/selection process or within the Administration Team. A clear and transparent selection process will be applied following consultation with HR and Unison to both manage the welfare of staff through the changes and to ensure that the current staff are matched to the right role in the future structure.
2. Assessment Team Police Officers- There will be a selection process for the growth in police officers. Consideration will be given for those registered disable under the Equality Act and reasonable adjustments made if unable to perform operational duties.
3. Recruitment of new staff – The current workforce mix has been reviewed for professional Standards Branch Investigations.
4. Complainants/ Community – The current structure is not able to cope with the level of demand. The waiting times for investigation cases to be resolved are excessive with the current average being 241days. This impacts on public confidence and service delivery within Professional Standards.
5. Officers/Staff under investigation – The amount of time taken to investigate either a criminal case or cases that go to Gross Misconduct far exceeds 241 days with some taking over 2 years. This affects the officers/staff general wellbeing and sickness inevitably increases. This also coincides with the number of days lost due to restrictions/suspensions which on average are 171 days a year. The changes proposed will reduce these timescales.

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## 8.1 Evidence

Consultation has begun with the Equality and Diversity team [REDACTED] and will continue throughout the approval and implementation process

The below data is a summary of the equality impact against the groups of Police officers and Police Staff who are affected by the proposals.

	Male	Female
PSB investigations	46.4%	53.6%
Force	58.1%	41.9%

	Declared Disabled	No disability
PSB investigations	5.40%	94.60%
Force	8.06%	91.94%

	BME	White
PSB inves	12.50%	87.50%
Force	5.74%	94.26%

	PSB investigations		Force	
	Male	Female	Male	Female
Under 20	0%	0%	0.7%	1.1%
20-29	3.8%	3.3%	8.4%	10.7%
30-39	11.5%	30.0%	29.3%	30.9%
40-49	38.5%	43.3%	36.3%	32.3%
50-59	34.6%	20.0%	21.9%	22.0%
60+	11.5%	3.3%	3.4%	3.0%
Total	100%	100%	100%	100%

	PSB investigations		Force	
	Declared Disabled	No disability	Declared Disabled	No disability
Under 20	0%	0%	0.0%	0.9%
20-29	0%	3.8%	3.3%	9.9%
30-39	0%	22.6%	21.6%	30.7%
40-49	100%	37.7%	36.6%	34.5%
50-59	0%	28.3%	33.2%	21.0%
60+	0%	7.5%	5.3%	3.1%
Total	100%	100%	100%	100%

	PSB investigations		Force	
	BME	White	BME	White
Under 20	0%	0%	1.8%	0.8%
20-29	14.3%	2.0%	22.0%	8.5%
30-39	14.3%	22.4%	33.9%	29.7%
40-49	42.9%	40.8%	26.8%	35.2%
50-59	28.6%	26.5%	14.4%	22.5%
60+	0.0%	8.2%	1.1%	3.4%
Total	100%	100%	100%	100%

Health and Safety representative will be consulted although it is anticipated that there will be no impact as Force headquarters is fit for purpose building and provides disabled access. Job descriptions will be provided for review during consultation.

The project team have engaged the support of HR & the Establishment Team. Specialist HR advice has been sought with regards to the changes to Job descriptions and the creation of new roles and the appropriate grading. HR has assisted with the engagement of staff and the relevant Staff Support Network(s). The Project Team continue to work with HR specialists to formulate the implementation approach and communications plan contained within this document.

## 8.2 Impact

All the Assessment Team Police Staff and all Police Officers in Professional Standards will undertake training and complete the Equality Course. They will also undertake communication and unconscious bias training.

- It is recognised that changes to job descriptions and roles may have a potential impact on those with protected characteristics.
- The gender, disability and age groups within the protected characteristics may be impacted upon with the introduction of new job descriptions and role profiles. Any needs of individuals will be considered on a case by case basis. Any flexible working requests will be considered carefully and on an individual basis. Reasonable adjustments will be considered for anyone who considers them-self to have a disability according to their individual needs. Staff representatives will be kept informed as things progress.

## 8.3 Mitigation

In order to minimise the impact on protected characteristics, the following actions will take place to further mitigate any negative impact as a result of the proposed changes.

- Full consultation packs will be shared with Staff Support Networks.
- Further communication took place with them according to their wishes and as is required once any impact on those with protected characteristics is known,

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- We will ensure that there is continual communication with all staff and affected groups where a negative impact is identified.
- We ensured that any staff on maternity or sick leave received the same communication as other staff.
- We conducted open question sessions on different days / times to engage with as many staff as possible.
- We will hold HR workshops to help staff prepare for their selection interviews – these will be held on different days and times to accommodate all staff availability.
- We will make appropriate adjustments to accommodate individual needs / requests during the HR Workshops and Selection Interviews.
- We will provide information and updates in a timing manner, using different channels of communications.
- Staff will receive 1-to-1 sessions when provisional results and notice of changes are communicated.
- We continue to provide support and information, via face to face, telephone, intranet, and mailbox.

*Guidance notes A and B are for guidance and can be deleted before submission to the PMO*

**Guidance note A – Independent Review Group Contacts**

*Unison, Federation, Health & Safety, HR and Finance have been consulted on the changes requested as part of this business case.*

Business Area	Contact name	Ext Number
Finance		
IS		
Mobile		
HR		
Establishment		
OLWD		
Fleet		
Estates		
Business Support Services		
Change Branch		
External Relations and Performance		
Unison		
Police Federation		
Supts Association		
Procurement		
Equality & Diversity		
Health & Safety		
OPCC		

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## Equality Legislation

Single Equality Duty is:

“A public authority must, in the exercise of its functions, have due regard to the need to—

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”

The “relevant protected characteristics” are:


- age
- disability,
- gender reassignment,
- marriage and civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex and
- sexual orientation.

Whereas the previous three Duties for race, disability and gender all differed in the duties they placed upon public authorities, the new Equality Duty applies to all 8 of the protected characteristics equally.

What is “due regard” in relation to advancing equality of opportunity?

“Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and person who do not share it, involves having due regard, in particular, to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share relevant protected characteristic that are different from the needs of persons who do not share it; and
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.”

For further guidance, please contact the Equality Team 

## **Appendix C1: Full Implementation Costs**

*Please copy & paste 'Appendix C1' from 'Full Implementation costs' tab in the financial workbook.*

There are no implementation costs

## **Appendix C1: Supporting Notes**

*Please provide any supporting comments as required, particularly on the classification of specific expense items. In particular please provide details where costs have been 'capitalised' &/or split across expense categories, for example, prepaid licence & support costs may be paid for in one year, but represent one year 'capitalisation' & 3 years on-going revenue costs*

**Appendix C2: Optimism Bias**

*Please copy and paste from AppC2 Optimism Bias*

There is no optimum bias in this paper.

**Appendix C2: Optimism Bias**

*Please copy and paste from AppC2 Optimism Bias*

There is no optimum bias in this paper.

**Appendix C2: Supporting Notes**

*Please provide any supporting comments as required*

Not applicable

## Appendix D: Future Revenue Implications

Please copy and paste AppD Future Revenue Implications table from the financial workbook

Future Revenue Implications							
Summary Description	Ref No.	17/18	18/19	19/20	20/21	21/22	Total
<b>REVENUE BUDGET (Savings)</b>							
Disestablish 1 x Inspector post	1	-£36,037	-£72,073	-£72,073	-£72,073	-£72,073	-£324,329
Disestablish 1 x Sergeant post	2	-£29,458	-£58,916	-£58,916	-£58,916	-£58,916	-£265,122
Disestablish 1 x Grade H	3	-£20,540	-£41,079	-£41,079	-£41,079	-£41,079	-£184,856
Disestablish 1 x Grade D	4	-£13,719	-£27,438	-£27,438	-£27,438	-£27,438	-£123,471
<b>Total Revenue Budget - (Savings)</b>		<b>-£99,754</b>	<b>-£199,506</b>	<b>-£199,506</b>	<b>-£199,506</b>	<b>-£199,506</b>	<b>-£897,778</b>
<b>REVENUE BUDGET - Costs</b>							
Establish 8 x Constable posts	5	195,840	£391,680	£391,680	£391,680	£391,680	1,762,560
Establish 1 x Grade I	6	£22,194	£44,388	£44,388	£44,388	£44,388	199,746
Establish 6 x Grade E	7	£91,882	£183,763	£183,763	£183,763	£183,763	826,934
Establish 1 x Grade G	8	£18,799	£37,598	£37,598	£37,598	£37,598	169,191
IS equipment - computer monitors & headsets	9	£750					£750
External training courses	10	£4,000					£4,000
<b>Total Revenue Budget - Costs</b>		<b>333,465</b>	<b>£657,429</b>	<b>£657,429</b>	<b>£657,429</b>	<b>£657,429</b>	<b>£2,963,181</b>
<b>External Funding</b>							
<b>Total External Funding</b>							
<b>Total Net Revenue Implications Cost/(Saving) to GMP</b>		<b>£233,711</b>	<b>£457,923</b>	<b>£457,923</b>	<b>£457,923</b>	<b>£457,923</b>	<b>£2,065,403</b>
<b>Efficiency (Savings) [Non Cashable]</b>							
<b>Total Efficiency Savings</b>							

Total Net impact on GMP SFO	17/18	18/19	19/20	20/21	21/22	Total
Total Revenue Implications to GMP	£233,711	£457,923	£457,923	£457,923	£457,923	£2,065,403
(Savings) already accounted for in SFO						
<b>Total (savings)/cost impact to GMP SFO/Budget</b>	<b>£233,711</b>	<b>£457,923</b>	<b>£457,923</b>	<b>£457,923</b>	<b>£457,923</b>	<b>£2,065,403</b>

## Appendix D: Supporting Notes

Put any supporting information to explain the basis behind savings, calculations and assumptions made where indicated in Section 4.

- 1 Inspector post is the Investigating Officer post. Implementation date is 01.10.2017.
- 2 Sergeant post is the Assisting Investigating post. Implementation date is 01.10.2017.
- 3 Grade H post is the Complaints Manager that is being upgraded to Grade I effective from 01.10.2017
- 4 Grade D post is the Senior Investigations Support Officer effective from 01.10.2017.
- 5 The Constable posts are Investigator posts. Implementation date is 01.10.2017
- 6 The Grade I is the new Grade for the Complaints Manager effective from 01.10.2017.
- 7 The Grade E posts are for 5 x Assessment Officers and an Administration Manager. Effective date is 01.10.2017.
- 8 Grade G x1 Intelligence Analyst - Organisational Learning Post. Effective 01.10.2017
- 9 Headsets and monitors for new staff
- 10 External training at Sanctus for PSBI and DSI courses for 5 new staff.

It should be noted that the temporary posts of Service Recovery & Appeals Officer (1 x Grade J) and Service Recovery & Appeals Support (2 x Grade C) will end on 31.03.2018.

Op IDRIS Investigator Police Staff (Grade G) - no current end date available - attached to ongoing Grainger Enquiry

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## Appendix E: Details of Project Investment Resources

Please copy and paste AppE People Resources from the financial workbook

Details of Full Project Costed Investment - People Resources												
Post/Job Title	Grade/ Rank	Ref. No.	Day £	Nos people	17/18	18/19	19/20	Total	17/18	18/19	19/20	Total
Type of Resource					Working Days Required			£	£	£	£	
External Resource - Capital (funding required)												
								-	£0	£0	£0	£0
								-	£0	£0	£0	£0
								-	£0	£0	£0	£0
Total External Resource Capital				0	-	-		-	£0	£0	£0	£0
GMP Resource - Capital (funding required)												
								-				£0
								-				£0
								-				£0
Total GMP Resource Capital				0	-	-		-	£0	£0	£0	£0
Total Resource - Capital				0	-	-		-	£0	£0	£0	£0
External Resource - Revenue (funding required)												
								-	£0	£0	£0	£0
								-	£0	£0	£0	£0
								-	£0	£0	£0	£0
Total External Resource Revenue				0	-	-		-	£0	£0	£0	£0
GMP Resource - Revenue (funding required)												
								-				£0
								-				£0
								-				£0
Total GMP Resource Revenue				0	-	-		-	£0	£0	£0	£0
Total Resource - Revenue				0	-	-		-	£0	£0	£0	£0
TOTAL FUNDED PEOPLE RESOURCES				0	-	-		-	£0	£0	£0	£0

				17/18	18/19	19/20	Total
GMP Resource - no funding required	Grade/ Rank	Ref. No.	Nos people	Working Days Required			
Project Manager	L		1	50.0			50.0
HR Advisor	K		1	30.0			30.0
HR Caseworker	G		1	20.0			20.0
PSB Police Staff	G		1	20.0			20.0
PSB Inspector	Insp		1	70.0			70.0
PSB PC	PC		1	8.0			8.0
Total			6.0	198.0	-	-	198.0

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## **Appendix F: External Funding**

*Please copy and paste the 'External funding' table from the financial workbook*

There is no external funding.

Has written confirmation of external funding been received?

- ☐ Yes
- ☐ No

If yes, please provide details. If no, please explain when this will be received.

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## Appendix G: Permanent Establishment Changes Summary

Please copy and paste Appendix G Permanent Establishment Changes table from the financial workbook

CURRENT OPENING ESTABLISHMENT SUMMARY:						
	17/18	18/19	19/20	20/21	21/22	22/23
Officers	32.0	32.0	32.0	32.0	32.0	32.0
Staff	21.0	21.0	21.0	21.0	21.0	21.0
PCSOs	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total Net Change (FTE)</b>	<b>53.0</b>	<b>53.0</b>	<b>53.0</b>	<b>53.0</b>	<b>53.0</b>	<b>53.0</b>

Establishment changes required																
Unit	Business Area	Activity Code	Post Title	Post Number	Grade/ Rank	Job Description Evaluated?	Main/ Temp	Funding Stream	Start Date	End Date	17/18	18/19	19/20	20/21	21/22	22/23
											FTE	FTE	FTE	FTE	FTE	FTE
<b>Details of additional police officer posts required</b>																
PSB	PSBI	310	H10G	Chief Inspector Operations		Chief Inspector	Main	DFM	01.10.2017		3.0	3.0	3.0	3.0	3.0	3.0
PSB	PSBI	310	H10G	Organisation Learning, Prevention & Education Manager		Inspector	Main	DFM	01.10.2017		1.0	1.0	1.0	1.0	1.0	1.0
PSB	PSBI	310	H10G	Investigations Manager		Inspector	Main	DFM	01.10.2017		2.0	2.0	2.0	2.0	2.0	2.0
PSB	PSBI	310	H10G	Misconduct Proceedings Officer		Sergeant	Main	DFM	01.10.2017		1.0	1.0	1.0	1.0	1.0	1.0
PSB	PSBI	310	H10G	Investigations Supervisor		Sergeant	Main	DFM	01.10.2017		3.0	3.0	3.0	3.0	3.0	3.0
PSB	PSBI	310	H10G	Assessment Team Supervisor		Sergeant	Main	DFM	01.10.2017		1.0	1.0	1.0	1.0	1.0	1.0
PSB	PSBI	310	H10G	Organisation Learning, Prevention & Education Supervisor		Sergeant	Main	DFM	01.10.2017		1.0	1.0	1.0	1.0	1.0	1.0
PSB	PSBI	310	H10G	Coronial Officer		Constable	Main	DFM	01.10.2017		1.0	1.0	1.0	1.0	1.0	1.0
PSB	PSBI	310	H10G	Assessment Officer		Constable	Main	DFM	01.10.2017		2.0	2.0	2.0	2.0	2.0	2.0
PSB	PSBI	310	H10G	Investigating officer		Constable	Main	DFM	01.10.2017		16.0	16.0	16.0	16.0	16.0	16.0
<b>Total Additional Police Officer Posts (FTE)</b>											<b>31.0</b>	<b>31.0</b>	<b>31.0</b>	<b>31.0</b>	<b>31.0</b>	<b>31.0</b>
<b>Details of additional police staff posts required</b>																
PSB	PSBI	310	H10G	Administration Supervisor		E	Main	DFM	01.10.2017		1.0	1.0	1.0	1.0	1.0	1.0
PSB	PSBI	310	H10G	Complaints Manager		I	Main	DFM	01.10.2017		1.0	1.0	1.0	1.0	1.0	1.0
PSB	PSBI	310	H10G	Administration Support Officer		C	Main	DFM	01.10.2017		5.0	5.0	5.0	5.0	5.0	5.0
PSB	PSBI	310	H10G	Assessment Officer		E	Main	DFM	01.10.2017		5.0	5.0	5.0	5.0	5.0	5.0
PSB	PSBI	310	H06B	Intelligence Analyst		G	Main	DFM	01.10.2017		1.0	1.0	1.0	1.0	1.0	1.0
<b>Total Additional Police Staff Posts (FTE)</b>											<b>13.0</b>	<b>13.0</b>	<b>13.0</b>	<b>13.0</b>	<b>13.0</b>	<b>13.0</b>
<b>TOTAL ADDITIONAL POSTS (FTE)</b>											<b>44.0</b>	<b>44.0</b>	<b>44.0</b>	<b>44.0</b>	<b>44.0</b>	<b>44.0</b>
<b>Details of (reduction) in police officer posts required</b>																
PSB	PSBI	310	H10G	Investigating Officer	PXY0008321	Chief Inspector	Main	DFM	01.10.2017		(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
PSB	PSBI	310	H10G	Investigating Officer	PXY0010538	Chief Inspector	Main	DFM	01.10.2017		(2.0)	(2.0)	(2.0)	(2.0)	(2.0)	(2.0)
PSB	PSBI	310	H10G	Investigating Officer - Operations	PXY0009189	Inspector	Main	DFM	01.10.2017		(4.0)	(4.0)	(4.0)	(4.0)	(4.0)	(4.0)
PSB	PSBI	310	H10G	Assisting Investigating Officer - The Hub	PXY0009165	Sergeant	Main	DFM	01.10.2017		(2.0)	(2.0)	(2.0)	(2.0)	(2.0)	(2.0)
PSB	PSBI	310	H10G	Assisting Investigating Officer - Assessment & Misconduct	PXY0010213	Sergeant	Main	DFM	01.10.2017		(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
PSB	PSBI	310	H10G	Assisting Investigating Officer - Operations	PXY0009167	Sergeant	Main	DFM	01.10.2017		(4.0)	(4.0)	(4.0)	(4.0)	(4.0)	(4.0)
PSB	PSBI	310	H10G	Assisting Investigating Officer - Operations	PXY0009168	Constable	Main	DFM	01.10.2017		(11.0)	(11.0)	(11.0)	(11.0)	(11.0)	(11.0)
<b>Total Reduction in Police Officer Posts (FTE)</b>											<b>(25.0)</b>	<b>(25.0)</b>	<b>(25.0)</b>	<b>(25.0)</b>	<b>(25.0)</b>	<b>(25.0)</b>
<b>Details of (reduction) in police staff posts required</b>																
PSB	PSBI	310	H10G	Senior Investigations Support Officer	CXY0009175	D	Main	DFM	01.10.2017		(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
PSB	PSBI	310	H10G	Complaints Manager	CXY0009162	H	Main	DFM	01.10.2017		(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
PSB	PSBI	310	H10G	Misconduct Administration officer - assessment & Misconduct	CYD0002027	C	Main	DFM	01.10.2017		(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
PSB	PSBI	310	H10G	Investigation Support Officer	CXY0009172	C	Main	DFM	01.10.2017		(4.0)	(4.0)	(4.0)	(4.0)	(4.0)	(4.0)
<b>Total Reduction in Police Staff Posts (FTE)</b>											<b>(7.0)</b>	<b>(7.0)</b>	<b>(7.0)</b>	<b>(7.0)</b>	<b>(7.0)</b>	<b>(7.0)</b>
<b>TOTAL REDUCTION IN POSTS (FTE)</b>											<b>(32.0)</b>	<b>(32.0)</b>	<b>(32.0)</b>	<b>(32.0)</b>	<b>(32.0)</b>	<b>(32.0)</b>

SUMMARY:						
	17/18	18/19	19/20	20/21	21/22	22/23
<b>TOTAL NET CHANGE (FTE)</b>	<b>6.0</b>	<b>6.0</b>	<b>6.0</b>	<b>6.0</b>	<b>6.0</b>	<b>6.0</b>
Officers	6.0	6.0	6.0	6.0	6.0	6.0
Staff	6.0	6.0	6.0	6.0	6.0	6.0
PCSOs	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total Net Change (FTE)</b>	<b>12.0</b>	<b>12.0</b>	<b>12.0</b>	<b>12.0</b>	<b>12.0</b>	<b>12.0</b>

CLOSING ESTABLISHMENT						
	17/18	18/19	19/20	20/21	21/22	22/23
Officers	38.0	38.0	38.0	38.0	38.0	38.0
Staff	27.0	27.0	27.0	27.0	27.0	27.0
PCSOs	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total Closing Establishment</b>	<b>65.0</b>	<b>65.0</b>	<b>65.0</b>	<b>65.0</b>	<b>65.0</b>	<b>65.0</b>

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## **Appendix H: Changes since Options Paper (G2)**

*Please copy and paste the 'Changes to Project Investment' and the 'Changes to Revenue Implications' table from the 'Changes since Option Paper' tab in the financial workbook*

Not applicable

## **Appendix H: Changes since Options Paper (G2)**

*Please copy and paste the 'Changes to Project Investment' and the 'Changes to Revenue Implications' table from the 'Changes since Option Paper' tab in the financial workbook*

Not applicable

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## **Appendix H: Changes since Options Paper (G2)**

*Please copy and paste the 'Changes to Project Investment' and the 'Changes to People Resources' table from the 'Changes since Option Paper' tab in the financial workbook*

Not applicable

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Table 1.1 Assessment Team Demand and Flow Activities

	Volume	Activity	Activity	Activity	Activity	Activity	Activity	Activity	Total Time Required (Hrs)
<b>Business Interest</b>	<b>2492</b>	<b>Check</b>	<b>Review</b>	<b>Send</b>	<b>Register</b>	<b>Chase</b>			
Activity Time		5	5	5	10	20			
Total Time		12460	12460	12460	24920	49840			1899.0
<b>Leavers/Career Breaks</b>	<b>520</b>	<b>Checks</b>	<b>Review</b>	<b>Send</b>	<b>Finalise</b>				
Activity Time		10	5	5	10				
Total Time		5200	2600	2600	5200				260.0
<b>Post</b>	<b>3600</b>	<b>Read</b>	<b>Scan</b>	<b>Move</b>					
Activity Time		5	5	5					
Total Time		17800	17800	17800					890.0
<b>Phone</b>	<b>6340</b>	<b>Call</b>	<b>Record</b>						
Activity Time		5	10						
Total Time		26700	63400						1335.0
<b>Complaints</b>	<b>1537</b>	<b>Read</b>	<b>Research</b>	<b>Contact</b>	<b>Prepare Handover</b>	<b>Recording Decision</b>	<b>Briefing</b>	<b>Webfocus</b>	
Activity Time		10	15	15	20	10	10	30	
Total Time		15370	23055	23055	30740	15370	15370	49110	2817.8
<b>Conduct</b>	<b>351</b>	<b>Read</b>	<b>Research</b>	<b>Prepare Handover</b>	<b>Webfocus</b>				
Activity Time		10	15	10	30				
Total Time		3510	5265	3510	10530				380.3
<b>Policy / Misc</b>	<b>172</b>	<b>Read</b>	<b>Research</b>	<b>Contact</b>	<b>Prepare Handover</b>	<b>Recording Decision</b>	<b>Briefing</b>	<b>Webfocus</b>	
Activity Time		10	15	15	10	10	10	30	
Total Time		1720	2580	2580	1720	1720	1720	5160	286.7
<b>Referrals</b>	<b>124</b>	<b>Referral Form</b>							
Activity Time		90							
Total Time		11160							186.0
<b>Service Recovery</b>	<b>1570</b>	<b>Read</b>	<b>Research</b>	<b>Contact</b>	<b>Prepare Handover</b>	<b>Recording Decision</b>	<b>Record</b>		
Activity Time		10	15	15	10	10	20		
Total Time		15700	23550	23550	15700	15700	31400		2093.3

15666

Total Hours	10118.08333
Days	366
Work Days	252
Leave	224
Training	6
Abstraction	8
One-To-One	2
Total Days	208
80% availability (Hrs)	6.25
Total Hours Available	1300

This is recording  
service recovery levels  
future proof?

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Table 1.2

Investigations – Type, Volume, Hours and Average per Investigation – FTEs

PSBi Local Investigation; Case Type and Associated Activity Time					
Type	Reviewed Volume	%	Estimated Volume (Year End)	Hours per Investigation	Average per Investigation
Excessive Force	170	28.57%	210	6671.7	31.77
Off Duty Criminal	75	12.61%	88	3937.63	44.56
Misc	62	10.42%	81	2085	25.74
Failure to take Action	57	9.58%	67	1323.46	19.71
DSI	41	6.89%	48	2469.96	51.13
Data Protection	37	6.22%	44	676.13	15.51
Pervert Investigation	37	6.22%	44	3314.7	76.04
<i>DSI - Death (Coronial Team)</i>	<i>29</i>	<i>4.87%</i>	<i>34</i>	<i>2097.46</i>	<i>61.39</i>
Discrimination LR	27	4.54%	32	846.21	26.60
Incivility	16	2.69%	19	555	29.44
Sexual Predator	13	2.18%	15	460.51	30.07
Unlawful Arrest	12	2.02%	14	437.27	30.93
Property	11	1.85%	13	222.42	17.16
Custody	5	0.84%	11	274.2	24.93
Social Media	3	0.50%	9	92.23	10.25
Total	595	100.00%	701	25463.88	36.33
				Administration Hours	6650
				Total Hours Req	32113.88
				<b>24</b> FTE	

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Table 1.3 Implementation Plan

Work Area	Theme	Activity	Owner	Contributors	Completed
Consultation		Submit to COG - Request to Consult			
		Brief SLT			
		Prepare consultation packs			
		Review consultation packs with HR/PSB Project Lead			
		Establishment Reconciliation			
		Begin Formal Consultation			
		Meet with Federation (Force)			
		Meet with Unison (Force)			
		Meeting with Local Federation / Unison reps			
		Meeting with affect staff - brief on proposals			
		Letters to affected officers and staff			
		Hold staff meetings to collate views and feedback			
		Question and Answer facility - defined consultation period			
		Update COG Board with collated feedback / responses			

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<b>Assessment Team</b>	<i>Recruit</i>	Sign off Job description			
		Create Job Advert			
		Create Application process			
		Set advertisement/deadline dates			
		Design interview process			
		Allocate interviewers			
		Advertise assessment officer roles on Intranet			
		Paper sift - allocate resource			
		Set interview dates			
		Interview & Appoint			
	<i>Induction</i>	Design Induction pack			
		Phased Plan - 1st 12 weeks in role of Assessment Officer			
	<i>Products</i>	Handover document review			
		Handover document formatting			
		Misconduct reporting form reviewed, signed off, formatted % distributed			
	<i>Training</i>	Business Interest Process - Guidance Document			
		Complaint Process - Guidance Document			
		Conduct Process - Guidance Document			
		Careers/Leavers - Guidance Document			
		Referral process - IPCC / Coroner			
		PSBi Course			
		Communications Skills course			
	<i>Mentoring</i>	Assign mentor for individual Officers - process / legislation support			
	<i>Hardware/Software</i>	Compile list of hardware/software (Business Case)			
		Purchase order to IT			
		Arrange IT resource to load software requirements			
		Check desks for all hardware/software x 7			
	<i>Shift</i>	Agree working hours - design pattern (work up to 7pm)			
		Agile policy			

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<b>Investigations</b>	<b>Products</b>	<b>Case Workbook Product Review</b>			
		Customer Contact Log			
		IPCC Contact Log			
		Officer Contact Log			
		Initial Assessment			
		Primary Investigation Strategy			
		Secondary Investigation Log			
		File Review Log			
		IO Report			
		<b>Case Workbook Product Formatting</b>			
		<b>Casebook Completion Guide</b>			
		Complainant Letter - Draft Templates			
		IT - PSB Shared Drive Access			
	<b>Process</b>	<b>Allocation Tool - Review &amp; apply fixes</b>			
		<b>S drive access set up on staff desktops</b>			
	<b>Training</b>	Complete Training Matrix with Course requirements			
		Find available dates for courses			
		Book courses			
		Maintain recording keeping			
	<b>BAU</b>	Agile Working			
	<b>BAU</b>	Laptop pools / fobs			

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<b>Appropriate Authorities</b>	<i>BAU</i>	Scheme of Delegation review			
	<i>Process</i>	Work review - 4 x CI/Complaints Manager			
	<i>Process</i>	Triage / Clinic - trial process			
	<i>Training/Mentoring</i>	Plan for all CI or Equiv. to complete sign-offs - Training			

<b>Misconduct - Case to Answer</b>	<i>Process</i>	Phased plan to be mapped out to introduce all Admin to processes			
		Case to Answer - Case Conference Protocols - who arranges meetings etc			

<b>Organisational Learning &amp; Prevention/Educations</b>		Agree Sgts duties / responsibilities			
		Intelligence Analyst responsibilities			
		Management Information Officer responsibilities			

<b>Administration Team</b>	<i>Training</i>	Phased plan to transfer duties in Assessment Team (Careers Checks etc)			
	<i>Process</i>	Review tasks in line with business case to agree timeline for			
	<i>Recruit - Manager</i>	Sign off Job description			
		Create Job Advert			
		Create Application process			
		Set advertisement/deadline dates			
		Design interview process			
		Allocate interviewers			
		Advertise assessment officer roles on Intranet			
		Paper sift - allocate resource			
		Set interview dates			
		Interview & Appoint			
	<i>Demand</i>	Review 'other' inboxes - view to amalgamating with Assessment Team inbox			

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<b>Meeting structure</b>		Review daily tasking meeting - Attendees / Content			
		Review TTCG			
		Wellbeing board			
		Informal briefings			
		Change Governance - Issues Management - Agree business reps and agenda			
		1-2-1s / PDRs - set up diary for all staff to book in 1-2-1s / PDRs			

<b>Branch Performance</b>		Reporting arrangements - agreed weekly/monthly reporting			
		Branch dashboard production - design performance reporting tool			
		Report products - design			
		Statutory/Mandatory arrangements			
		Baseline current performance			
	<i>Recruit - MIO</i>	Sign off Job description			ü
		Create Job Advert			ü
		Create Application process			ü
		Set advertisement/deadline dates			ü
		Design interview process			ü
		Allocate interviewers			ü
		Advertise assessment officer roles on Intranet			ü
		Paper sift - allocate resource			ü
		Set interview dates			ü
		Interview & Appoint			ü

<b>General</b>	<i>Communications</i>	Force Announcement			
		Engagement strategy - key stakeholders / comms methods			
		Brief Article			
		Branch Commander Awards - Good Practise / Ethical Behaviour			
	<i>Divisional support</i>	Toolkit - Design toolkit as guidance for divisional officers			
		Advice Line - agree branch SPOCs based on divisional or area			

NOT PROTECTIVELY MARKED (until complete)

		Administration support to division			
		Management Action review			
		UPP - guidance			
	Website	Certificates - chase IT			
		Implement Lancs version on GMP website			