Guidance for Public Order Public Safety Command Roles Accreditation and Re-Accreditation

Programme Title: Public Order Public Safety Command

Version 1.7 – released 7th June 2018
Foreword

As the new Chair of the NPCC, Tactics, Training, Equipment Working Group (Public Order), I am pleased to introduce the first review and update of this guidance document since its introduction in June 2017.

The development by the College of Policing of clearer standards around the requirements to achieve operational competence build upon the previous good work. The new Events Module in replacement of the old Policing Event Course represents a greater emphasis on Public Safety, alongside Public Order and embedding it as a requirement for all new commanders supports this position.

I am keen to lead in this area of business by working with the College to ensure the best support to forces and commanders in the application and management of those standards both at the initial stage and through ongoing CPD and accreditation.

This guidance continues to do that and I recommend it to you as a succinct reference point to this high risk area of business.

It is still relevant to include the foreword by my predecessor as to the origins for its introduction.

DCC B. J. Harrington

Chair: Tactics, Training, Equipment Working Group (Public Order) – June 2018
This guidance document is intended to assist forces in understanding their obligations in managing the selection, initial accreditation and ongoing reaccreditation of their Public Order Commanders and tactical advisors.

It makes reference to relevant sections contained within the Public Order Curriculum and provides the reader with an understanding of the framework in which licensed training delivery centres work and the rules they are bound by, such as ‘entry criteria’ in order to access courses. The entry criteria contained within this document give clear direction as to those standards, however it does provide guidance as to when Chief Constables can apply an ‘extraordinary exception’ for their respective commanders.

Public Order Public Safety Policing has evolved significantly in the last 30 years however public perception is often focused by high profile past events.

In April 2016 the Hillsborough Inquest concluded, delivering a verdict of the unlawful killing of the 96 victims in 1989 whereby Police Command was a contributory factor. The College of Policing response to questions regarding lessons learnt and potential for a similar event occurring now highlight improved training and the consistency and maintenance of command standards.

In October 2016 Home Secretary Amber Rudd rejected the possibility of an enquiry into the ‘Battle of Orgreave’, clashes between the Police and miners during the 1984 miners’ strike.

Both these examples highlight the growing potential for historical inquiries into Public Order deployments and the absolute necessity for auditable command accreditation, reaccreditation and record keeping.

The recent Benefits Summary Specialist Capability Programme report makes specific reference under the Capability Leadership section regarding;

- Greater focus and consistency of training
- Development of common standards leading to more effective resource utilisation

Therefore in making the decision to step outside of the national standards Chief Officers MUST consider these factors but also the below comments of the Home Affairs Select Committee review of the College of Policing in July 2016 (recommendation 4) which states;

“The alarming lack of consistency across forces illustrates the scale of the challenge facing the College of Policing as it endeavours to implement a national approach to raising standards. We support the concept of national standards, whereby a police officer in Leicestershire can be judged by the same criteria as one based in Suffolk. Chief Constables must not disregard the advice of the College of Policing—that advice is part of the reason we have a College in the first place” (Paragraph 18).

DCC Paul Brandon

Chair: Tactics, Training, Equipment Working Group (Public Order) – June 2017
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Purpose of this document

To support the Public Order Command Curriculum with guidance and clarification that allows forces to manage the selection, initial accreditation and ongoing re-accreditation of their Public Order Commanders and tactical advisors. It highlights not only the standards and where they can be found but also the scrutiny with which both approved licenced delivery centres and all other forces must apply in the management of those standards for command training.

To aid the reader it focuses on 3 distinct areas;

- Pre – Course and selection
- The Course (Occupational Competence)
- Post Course initial accreditation and re-accreditation (Initial and ongoing Operational Competence)

Target audience

This document is aimed at all officers who manage the capacity and capability of Public Order Commanders and tactical advisors in force. Whilst not exclusive to, it is specifically of benefit to forces;

- Chief Officer strategic lead for public order (MUST be at least the rank of ACC).
- Tactical lead for public order (at least the rank of C/Insp or Supt)
- Public order training lead at operational level
- Licensed command trainers
- L&D officers with responsibilities in supporting standards and assessment
- Operational Planning and Resourcing Departments with responsibility for mobilisation testing and providing data to NPoCC in support of MERCURY.
Guidance Aim

The overall purpose of this document is to:

- Ensure a standardised and consistent approach to Public Order Command learning and accreditation across all forces.¹
- Improve the interoperability of Public Order commanders and tactical advisors across² all forces,
- Ensuring consistency of decision making across all forces.

Programme Curriculum

The full curriculum consists of a range of material which supports the main Public Order Command Programme Specification³. This document outlines the specific standards that licensed delivery centres MUST meet in order to obtain and maintain college approved license delivery status.⁴ In applying these requirements licensed forces are acting on behalf of the College who set the standards and the NPCC who manage them.

The curriculum can only be accessed via the Managed Learning Environment. Some material is restricted access for use only by licensed delivery centres. The documents relevant to the general management of Initial and ongoing Operational Competence in force are not restricted and are listed below.

- Programme Specification,
- Workplace Assessment Portfolio (initial operational competence phase),
- Guidance for workplace assessors,

¹ Aim one, Public Order Command Programme Specification 2016
² Aim two, Public Order Command Programme Specification 2016
³ Previously referred to as the Programme Handbook
⁴ Alternatively referred to as Approved Providers
Management of the Process

It is the responsibility of each force to have in place an auditable process for the management of Public Order Command accreditation to ensure compliance and safeguarding of National standards (as outlined in the programme specification). There are some key roles which MUST be identified to ensure that decision making sits at the appropriate level.

Role and Responsibilities

**Lead Chief Officer** – Each force MUST identify a lead officer, who MUST be at least the rank of ACC to ensure that decision making and its rationale sits at the appropriate level. They ultimately own the process for the management of Public Order Command on behalf of the Chief Constable and in support of the National Strategic Policing Requirement.

**Work Place Assessor** (Sometimes referred to as a mentor and in some cases is in addition) – This person must be operationally competent within the role being assessed.

And

Meet the minimum College ‘Assessor’ standard or be a qualified NVQ Assessor.

**Force Internal Verifier** – This role is to ensure standardisation across the assessment process and support the Chief Officer lead in their decision making process. All internal verifiers must meet the minimum College ‘Internal Verifier’ standard.

For full details of the College's standards for assessors and internal verifiers, please refer to the relevant section on the “Standards for Police Training Roles” page of the College of Policing website.
System of management

There is no preferred or recommended system with some forces utilising bespoke electronic systems such as Chronicle whilst others simply use spreadsheets. In its management of the command and tactical advisor roles each force **MUST** be able to maintain records which accurately identify:

- Operationally competent Gold, Silver, Bronze Commanders and tactical advisor’s,
- The date of their initial occupational competence,
- The date they achieved operational competence,
- The date each commander completed the annual requirements of each role to maintain competence,

Once a Commander or tactical advisor is considered operationally competent and has been registered with the College there is no further requirement to advise the College about re-accreditation. From this point onwards re-accreditation is a matter for the force to manage in line with the programme standards which includes the annual, mandated College of Policing C7 command refresher. Management of these standards by forces is to ensure only appropriately trained roles are held on MERCURY which is maintained by NPoCC.

Selection and Course Pre-requisites

Each force will have its own method of selecting commanders, however, they **MUST** comply with the entry conditions, (unless subject of an extraordinary exception) which licensed delivery centres are required to check and enforce to ensure consistency and suitability for mutual aid.

Pre-course entry requirements are set out by The College of Policing & NPCC. Licensed delivery centres are required to check these requirements prior to students enrolling on the course. Command training centres are required to ensure all students meet these requirements in order to retain College of Policing Approved license delivery status, ensuring national standards are maintained.

If a Lead Chief Officer Public Order decides to deviate from the programme entry requirements by way of an ‘Extraordinary Exception’ then they **MUST** underwrite this risk within their own force. A rationale for this decision **MUST** be recorded, the commander will not be included on MERCURY where they do not meet the full national role profile and will only be deployable within their own force.

The College of Policing will be the final arbiter in whether an Extraordinary Exception will be allowed entry to a course
Appendix A provides a form for this purpose and this must be completed in advance of any course so that the appropriate notification can be recorded.

This form is intended for use by the relevant force Chief Officer Public Order lead to notify the licensed centre and the College of attendance by a Commander contrary to the Public Order Command Specification pre-requisites and role requirements.

Exceptions must consider the programme pre-requisites listed below.

At least the Rank of:

- Bronze - Inspector
- Silver - Chief Inspector
- Gold - Superintendent

Skills and previous experience;

These are:

- Bronze - Be currently accredited as a Level 2 Public Order Officer
- Silver - Trained, occupationally and operationally accredited Public Order Bronze Commander

OR

- Trained, occupationally and operationally accredited CBRN Silver Commander or Tactical Firearms Commander and able to demonstrate knowledge and awareness of public order tactics and considerations, gained from observing Level 2 Public Order Tactical Training within force. (This must be certified by their force.)

- Gold - Trained, occupationally and operationally accredited Public Order Silver Commander,

OR

- Trained, occupationally and operationally accredited CBRN Gold Commander, Strategic Firearms Commander or SIO PIP level 3 and above with appropriate support.

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5 Ranks must be substantive which means confirmed in post or temporary promotion but NOT acting.
Where exceptions or other commanders who have little or no POPS experience, Force Lead Chief officers MUST apply an appropriate development plan prior to attending the course. Some suggested considerations are;

1. Attend PO training and observe tactics taking place.
2. Observe a POPS commander, for example an SIO Gold candidate will have to observe a Peer commander by virtue of the learning programme so observation of a Silver may be of greater value.
3. Observation of planning meetings including Safety Advisory Groups.

‘The specific entry points (outlined above), as agreed by the NPCC are intended to provide the suitable policing experience, legal authority, strategic awareness and understanding for each requisite level of command’.

The command curriculum is intended to be testing and the learning programme is specifically designed to build on previous command and public order knowledge, understanding and experience. All commanders however MUST still meet the FULL role requirements for inclusion on MERCURY once they have attained operational competence.

The Course

The national Gold course will be delivered by the College. All other command roles will be delivered by a College of Policing licensed centre. During the course the trainers will build on the pre-existing knowledge and understanding and provide the learning required to undertake an occupational assessment. This should be a consideration when deciding whether to step out of the pre-requisite experience required.

If unsuccessful a development plan will be provided and it is a decision for the force based on feedback from the trainers as to whether a further assessment is undertaken.

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6 Public Order Command Programme Specification 2016
Post Course initial accreditation and re-accreditation

Accreditation

Following on from the core module undertaken by the commander or tactical advisor, accreditation is achieved by successful completion of the Events Module 7 and by way of demonstrating operational competence in the work place.

The process of accreditation is fully detailed in the following documents;

- Programme specification,
- Workplace Assessment Portfolio for the relevant role,
- Guidance for workplace assessors

Assessors and internal verifiers must be trained in line with the College standards. For further details, please refer to the relevant section on the “Standards for Police Training Roles” page of the College of Policing website.

Learners have 365 days from the day of the initial in course Occupational assessment to complete and submit to the College of Policing evidence of operational competence in the work place.

The Force Lead Chief Officer responsible for public order must sign off the approval of Operational Competence. This is a strategic organisational decision that MUST NOT be placed with training or planning teams but at the appropriate senior management level.

The example form at Appendix B is the only form that the college will accept to confirm initial accreditation and its use will ensure that all relevant parts of the process have been completed. Only then will the officer be included on the College of Policing’s national professional register and a certificate of achievement will be issued. At this point the officer can be included on MERCURY by the force only if complying with the full national role profile for the respective role i.e. rank plus occupational and operational competence.

This form, bespoke to the role, can be found in the Workplace assessment portfolio maintained by the officer under assessment.

The Events Module as part of operational competence.

On 1st April 2018 a new standard and supporting arrangements came into place that have the potential to affect all Commanders and PoTac’s.

7 Introduced 01/04/2018 and supported by NPCC
On this date the Policing Events Course (PEC) ceased to exist and was replaced by the Events Module (EM).

Previously, the NPCC service position and direction was that all officers in a command role for football operations in addition to their occupational and operational competence, CPD and other mandated requirements MUST have attended a PEC.

The new standard recognises the importance and breadth of events policing such that all commanders and Tactical advisors should have the requisite training to operate in those environments.

All commanders (Gold / Silver / Bronze) and Tactical advisors will therefore adhere to the following new standard with effect from 01/04/2018.

- **New Commanders and Tactical advisors.** Completion of an Events Module will now form part of the operational competence phase and must be completed within the initial 365 days to achieve full initial accreditation. This does not change the premise that the officer under assessment must be accompanied by an operationally competent officer of the same role.

- **Existing Commanders and Tactical advisors.** Any officer who has completed a PEC between 01/01/2010 and 31/03/2018 is considered to be at the national standard and will not be required to complete any other course outside of their annual C7 command refresher. Any current, operationally competent officer who has not completed a course between these dates, can remain operational but MUST complete an Events Module by 31/03/2019.

- **Existing Commanders and Tactical advisors not completing an Events Module by 31/03/2019.** It is recognised that for some forces with historical arrangements this may take longer and should consider recording this on a force risk register if circumstances mean significant numbers may not attend a course until after this date. Continued deployment of them within force remains the decision of each force taking into account the rationale that will likely be required the further from the standard the Commander or tactical advisor is. The national standard for mutual aid beyond 31/03/2019 will not be compromised and therefore any Commander or tactical advisor who has not completed either a PEC or Events module MUST be removed from MERCURY.

Due to the overlap of existing roles and new during this transition period further detail is provided on a flow chart which can be found at Appendix C.
Re-accreditation

Re-accreditation is a process to be managed by forces in line with the standards set by the College. There is no requirement to send any forms to, or advise the College of the process.

With ongoing re-accreditation the most important aspect is to have an auditable, transparent and workable system in place that accounts for each commander and tactical advisor. Key points to bear in mind;

- Re-accreditation is for the force to manage including any risks associated with non-compliance.

- Re-accreditation must take place annually (every 365 days) with the Lead Chief Officer Public Order ensuring they themselves have approved re-accreditation.

- Where a Lead Chief Officer are themselves a Gold commander then regional arrangements should be made so that their re-accreditation is approved by their own or another regional lead so as to promote transparency.

- Where an officer has multiple roles and some do not meet the national standards, this must be reflected in updates to MERCURY so that only the national standard is recorded on the officers MERCURY role profile.\(^8\)

- Where commanders fall out of accreditation, this is identified and a development plan put in place to address any gaps, notwithstanding that;

- Any commander / tactical advisor who fails to reaccredit within 3 years (1095* days\(^9\)) of last re-accreditation or initial operational accreditation MUST attend a further initial course if they wish to continue in that role.

- If the national standard has not been met then the officer MUST be removed from MERCURY. Continued deployment of them within force remains the decision of each force taking into account the rationale that will likely be required the further from the standard the Commander or tactical advisor is.

It should be recognised that the Public Order Command Curriculum is about setting and maintaining minimum standards in a high risk area of business. This is based on best practice and learning which should inform Chief Officers when making decisions and should not restrict them in some situations setting additional requirements to meet a force or regional need.

\(^8\) This will require careful data management in the force process that updates MERCURY

\(^9\) Assuming no leap years.
Gathering evidence for reaccreditation should not be a bureaucratic process as most of the evidence should be contained within meeting notes, emails, strategic / tactical / operational plans and the application of them within the workplace.

Each commander will be expected to conduct a self-assessment to claim competence of the role specific National Occupational Standards (NOS) of operational competence in the workplace. At this stage only brief details are required of where that evidence is held.

This will signpost the Lead Chief Officer to where that evidence is held should they wish to view it. It is for each force to ensure it has a process that is sufficiently probative to ensure that case by case re-accreditation is meaningful but should not replicate the depth to which initial operational competence is assessed.

The programme specification makes reference to the passing of these forms for assessment and sign off. What must be shown and recorded is that a review of the requisite number of operations and other role requirements are conducted and they have demonstrated competence across the relevant NOS.

It is advised that commanders have a breadth of experience across a range of operations to evidence true ongoing competence. Where evidence is presented with a minimum number of operations of a similar nature to the previous year then this MAY be a reason for the requirement of more evidence of a different nature.

The Lead Chief Officer is therefore signing off re-accreditation by agreeing that ongoing competence has been evidenced. The depth to which that evidence is probed will be part of the decision making process when signing off re-accreditation.

An example is provided at Appendix D.
Appendix A

### Chief Officer's Report of Extraordinary Exception

Chief Officer's exercising exceptions should provide a rationale as deviation from the national standards determined by NPCC and detailed within the Programme Specification are likely to result in additional risk which must be managed by their own force.

<table>
<thead>
<tr>
<th>Police Service:</th>
<th>Chief Officer’s Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Service / Force Notifying)</td>
<td>(Minimum rank ACC or Commander for MPS Officers)</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Module:</th>
<th>Candidate’s Name:</th>
<th>Rank:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Gold, Silver or Bronze)</td>
<td>(Name of Prospective Candidate)</td>
<td>(Substantive Rank Candidate Holds)</td>
</tr>
</tbody>
</table>

**Rationale:** (Provide a brief rationale as to why this exception is necessary and that compliance with the standard or pre-requisites are not appropriate)

**Declaration:**

I ………………………………………………… acting within my capacity as Chief Officer for my service notify that an Extraordinary Exception is granted in relation to this officer as detailed above. I acknowledge that any additional risk which may occur as a result of this exception will be managed by my force.

Chief Officers Signature: Date

This form must be provided to the licensed centre delivering the training and a copy emailed to the College Public Order Public Safety team; POPS@college.pnn.police.uk
Appendix B

<table>
<thead>
<tr>
<th>Public Order Public Safety Command Curriculum - Record of learning and development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rank / Warrant Number / First / last name (as to be recorded on the national register):</td>
</tr>
<tr>
<td>Force:</td>
</tr>
<tr>
<td>Email:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Occupational Competence phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Order Gold/Silver/Bronze/Tactical Advisor Course</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Assessed as Occupationally Competent</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Operational Competence phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Learners have 365 days from Occupational Competence to complete this phase.</td>
</tr>
<tr>
<td>Events module</td>
</tr>
<tr>
<td>Or</td>
</tr>
<tr>
<td>PEC</td>
</tr>
<tr>
<td>Assessed as Operationally Competent through demonstration of the National Occupational Standards</td>
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<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Verification and Lead Chief Officer authorisation phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verifiers must ensure all boxes have been completed to ensure compliance with the process and standardisation prior to submission to the Force Lead Chief Officer for authorisation.</td>
</tr>
<tr>
<td>Operational Competence Approved – Any submission beyond 365 days MUST have an accompanying rationale</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Lead Chief Officer, Public Order - name</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Additional comments and rationale if required.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Registration Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Email completed form to the Public Order Public Safety team - <a href="mailto:POPS@college.pnn.police.uk">POPS@college.pnn.police.uk</a></td>
</tr>
<tr>
<td>Confirmation by the College will indicate that the standard has been met and the officers’ details recorded on the national professional register.</td>
</tr>
<tr>
<td>The force should now where required record or update the details on MERCURY.</td>
</tr>
<tr>
<td>Re-accreditation should now be managed by the force together with NPoCC via MERCURY.</td>
</tr>
<tr>
<td>*Electronic signatures can be used so long as the audit trail is acknowledged in the comments box.</td>
</tr>
</tbody>
</table>
Appendix C

Events Module transition arrangements for all Commanders and Tactical advisors from 01/04/2018.

Have you attended a PEC between 01/01/10 & 01/04/18?
  Y → No further courses required.
  N → Are you a current operationally competent Commander or tactical advisor?
    Y → Completion of Events Module required within 365 days of occupational assessment to become operationally competent.
    N → You may remain operational in existing role but must attend Events Module before 01/04/2019

Your details must be removed from MERCURY. Continued use will be a decision and risk to be managed in force until completion of an Events Module.

Currently or will be completing another core module - GSB / tactical advisor?
  Y → You may remain operational in existing role but must attend Events Module before 01/04/2019
  N → Have you attended an Events Module before 01/04/2019

Your details must be removed from MERCURY. Continued use will be a decision and risk to be managed

Your details may remain on MERCURY having attained the National Standard
Appendix D

This is an example Silver annual re-accreditation submission. It is not the definitive method but meets the minimum requirements and outlines the competencies claimed.

Whichever method is used it needs relate to the requirements of each specific role.

Westshire Police conduct an annual re-accreditation process every April to cover the previous 12 month period. The Force has also set a policy above the national standard that Commanders must complete 2 or more operations annually, of which they must differ in nature so as to ensure a broader range of experience.

Superintendent Adrian Johnson.

Occupationally Competent – 01/03/2009.
Policing Events Course – 14/06/2010
Last re-accredited on 01/04/2016

Annual C7 Command CPD – 19th January 2017
Observed Level 2 training – 28th September 2016 (in advance of football operation)

POPS Operations Completed during this period
Football – 5
Protest – 3
Festival - 1

Competence claimed in all areas of the Silver NOS with evidence submitted relating to 2 specific operations

Pinchester AFC v Crampton FC 01/10/2016
CAT CIR 27000 attendance, 3500 Away fans
Silver Command suite located at force control room
9 PSU’s (1 PSU mutual aid)

Operation resulted in Acceptable Outcome as per Strategic Plan – ACC Cole.

NOS claimed
CC201.1 – 1,2,3,5,6,7,8,9,10,11,12,13,14,15
CC201.2 – 1,2,3,4,5,6,7,8,9,10,11,12

Evidence held in Command log stored with Operational Support, copy emails held on force account.
Anti-Austerity Protest, Pinchester. 25/03/17
500 protestors marched through the town centre followed by an assembly outside the Guildhall.
Silver Command suite located at force control room.
2 PSU’s, 4 PLT teams, supporting community operation.

Of note intelligence regarding local youth who may present significant ASB and therefore impact on the procession and assembly mitigated by use of joint working diversion activities.
National learning submitted through post event reporting.

Operation resulted in Preferred Outcome as per Strategic Plan – C/Supt. Brown.

NOS claimed
CC201.1 – 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15
CC201.2 – 1,2,3,4,5,6,8,9,10,11,12

Evidence held in Command log stored with Operational Support, minutes from stakeholder meetings & copy emails held on force account.

All evidence available for review in support of competencies claimed.