



Meeting	People Committee
Date	28 August 2025
Location	Webex
Title of Paper	Modified Duties – Improvement Plan Update
Presented By	Director of People & Development, Katy Miller
Recommendation to Members	For Discussion
Appendix Attached	Appendix A: High-level modified officer workstream objectives

PURPOSE

The purpose of this paper is to set out

- The background and strategic context in relation to duty modifications
- Key activity to date
- Key data and insight and areas that require further consideration as a result
- Planned activity as a result of data/insight and a recent reflection session

1. BACKGROUND AND STRATEGIC CONTEXT

- 1.1 The issue of duty modifications was highlighted in Police Scotland's first Strategic Workforce Plan (SWP) published in 2021. The SWP resulted in the creation of a workstream linked to a number of local workforce plans indicating the proportion of officers requiring duty modifications was presenting difficulties with the effective deployability of resources and associated impacts on frontline policing. The report highlighted the number of officers requiring duty modifications rose by 59% from 2016 to 2020 (from 961 to 1,526).
- 1.2 On 30 June 2025 the number of officers on all forms of duty modifications (including PSD Restricted and Protected), was sitting at 2,553 (see section 3.1 for breakdown by category). Over the last couple of years there have been steps taken to seek to get a more nuanced understanding of the capacity impact and the actions required, by identifying the number of officers requiring duty modifications that are 'non-deployable' or 'deployable with restrictions' (see section 2.1.1).
- 1.3 The current duty modifications organisational risk (current score 16) outlines that a continuing upward trend of officers requiring duty modifications could result in insufficient deployable resources within divisions, impacting on service delivery. It also states resultant capacity issues could impact on workforce wellbeing and potentially increase the volume of work, which could cause the need to work extended hours, vary shifts and re-roster rest days. Additionally, it is recognised that this needs to be managed alongside the focus on inclusivity and adherence to the requirements of the Equality Act in relation to reasonable adjustments.
- 1.4 The current Strategic Workforce Plan 2024/27 (SWP) sets out a commitment to design and organise the workforce to create capacity and efficiency. The need to review our approach to officers requiring duty modifications is explicitly listed in the SWP as a key programme to support this. The SWP also highlights, through the Organisation Design Principles, that policing will identify opportunities to rebalance the workforce mix to ensure that police officers are carrying out roles that require warranted powers and/or specialist police knowledge and experience.
- 1.5 This strategic direction of travel has been strengthened through the 2030 Vision and Three-Year Business Plan with a focus on increasing frontline capacity and ensuring safer communities, less crime, supported victims and a thriving workforce.

- 1.6 There is a need for the work on duty modifications to concurrently consider the
- need to maximise operational policing capacity, particularly at the front-line, for the benefit of service delivery and the wellbeing of the workforce;
 - commitment to rebalance the workforce mix to ensure officers are carrying out roles that require warranted powers and/or specialist policing knowledge and experience; and
 - commitment to being an inclusive workplace with a focus of taking a proportionate approach to reasonable adjustments.
- 1.7 To be successful in delivering on the above there is a need to fully understand:
- current capacity impact in relation to officers requiring duty modifications and the key steps (based on evidence) that require to be taken to maximise capacity of the current group of officers requiring duty modifications.
 - warranted roles required to be carried out by police officers going forward to help inform the future approach to allocation of officers requiring duty modifications into suitable posts.
 - options available to progress a process within Police Scotland that would provide police officers with the opportunity to take up suitable police staff vacancies where appropriate.
 - Ensure an organisational position on ensuring availability of specific non-frontline roles to all police officers to support broader officer development and readiness for promotion.
 - Ensure an organisational position in relation to reasonable adjustment approaches aligned to the Equality Act and relevant case law The work progressing on developing an 'Annual Workforce Plan' includes work on 'modified officers' given the impact this has on workforce mix/design and scenario planning.
- 1.8 Additionally, work underway with 'Skills for Justice' (to undertake a systematic review of processes relating to police officer role profiles, including the suitability of rank and warranted status of roles) will likely see a reduction in the number of available police officer posts that are suitable for officers requiring duty modifications. This will therefore likely impact on defining what would be deemed a reasonable adjustment in the future.

2. KEY ACTIVITY TO DATE

2.1 SCoPE Categorisation

2.1.1 A significant update to the way in which duty modifications are now categorised on SCoPE was introduced in November 2022. This also ensures alignment to the naming conventions in place within police forces in England and Wales. To enhance operational deployment considerations, deployability status was also captured - 'Non-Deployable' and 'Deployable with Restrictions'.

2.1.2 More work is required in this area to consider the extent to which 'Deployable with Restrictions' actually represents deployability given that the data at Section 3.1 outlines 72.1% of those who are 'Deployable with Restrictions' currently work in 'Admin Only' posts.

2.2 Engagement with Optima

2.2.1 Proactive engagement is taking place with Optima Health (as Police Scotland's occupational health provider) through their Senior Medical Director and Clinical Lead to ensure appropriate consideration is given to the required capabilities of an officer as outlined in PNB Circular 10/4 (see section 1.7). This ensures that medical advice is based on what are the reasonable steps that should be taken when an officer is no longer able to carry out the full duties of the office of constable as outlined in PNB Circular 10/4:

- the ability to sit for reasonable periods, to write, read, use the telephone and to use (or learn to use) IT
- the ability to run, walk reasonable distances, and stand for reasonable periods
- the ability to make decisions and report situations to others
- the ability to evaluate information and to record details
- the ability to exercise reasonable physical force in restraint and retention in custody
- the ability to understand, retain and explain facts and procedures

2.3 Identification of Roles Suitable for Duty Modification

2.3.1 An exercise identifying police officer roles which were suitable to meaningfully deploy officers to requiring duty modifications was completed in January 2023. The number of roles identified at that time unsurprisingly showed that the opportunities were lower across the Local Policing Divisions and OSD (ranging from 6% to 10% of roles), with areas such as C3, SCD, CJSD and Corporate functions

providing increased opportunity. This has assisted to date in the identification of suitable alternative roles through the direction of the Duty Modification Panel.

2.3.2 This exercise highlighted there was a broader need for the organisation to review the roles which truly require to be undertaken by warranted officers. This work is underway, supported by Skills for Justice, in conjunction with areas of work linked to the Policing for our Communities Programme.

2.4 Finance and People Board Action – Meaningful Policing Duties

2.4.1 An action was tasked to review the meaningful policing duties being carried out by officers with modified duties. Data has been gathered relating to the areas in which officers with duty modifications currently work, however more engagement and detail is required to provide relevant information to deliver the intent of this action. Work continues in this area with the intention to provide an update to the next Finance and People Board.

2.5 National Duty Modification Panel – Purpose and Progress

2.5.1 The National Duty Modification Panel was established to consider all police officer cross-divisional transfer requests where divisions/departments are unable to accommodate an officer requiring duty modifications and where budgeted posts have been considered locally, including whether redeploying another deployable officer could facilitate retention in the division/department

2.5.2 Potential outcomes of panel considerations include referring cases for consideration of alternative suitable roles to the Resource Planning Co-Ordination Unit or Consideration of an Ill-Health Retirement Assessment.

2.5.3 This process is supported by divisional senior leadership team and Strategic HR Lead engagement to ensure all appropriate considerations are taken locally prior to making a referral to the Duty Modification Panel. To support and clarify the considerations that should be taken and progressed in the management of cases where officers require longer term duty modifications, a Duty Modification Pathway has been put in place and will be reviewed as part of the wider work being progressed.

2.5.4 As at May 2025 there have been 129 referrals to the panel, with 102 cases considered and 64 cases closed. 48 cases led to

redeployment of officers (75% of closed cases), nine resulted in Ill Health Retirement (14.1% of closed cases), and in the other cases the referral was either withdrawn or the decision was taken for the officer to remain in their current post.

2.6 National Duty Modification Panel – Reflection Session

2.6.1 With the panel running for a year, a lessons learned exercise took place on 30 June 2025 with this being jointly chaired by ACC Steve Johnson and Chief Human Resources Officer Nicky Page.

2.6.2 This reflection session identified:

- The posting impact that the Panel was having over the course of the previous year.
- The importance of ensuring continuous improvement in seeking to maximise capacity within the current operating model while recognising the importance and fundamental impact that the target operating model will bring in terms of a focus on ensuring officers carry out roles that require warranted powers etc.
- The importance of seeking to address and minimise the number of officers that require duty modifications working in supernumerary rather than permanent budgeted establishment posts.
- The need for development and provision of clear rules/guidance/governance for divisions in terms of steps taken to agree and implement duty modifications in the first place alongside clear rules/guidance in relation to the carrying out of effective reviews.
- The need to fully review and understand the current position with officers who have been on duty modifications for an extensive period of time.
- The importance of ensuring attendance management, duty modifications, reasonable adjustments and ill health retirements are considered as part of an end-to-end, rather than separate processes.
- The need to progress work to develop a process that would allow officers to consider vacant police staff posts as a suitable alternative to Ill Health Retirement.
- The importance of engagement with Optima to ensure they fully consider the policing context when making and providing medical assessments and advice.
- The need to fully understand the extent to which those who are deployable with restrictions are fully deployable to maximise policing capacity.
- The need for improved communication with the entire workforce with regards to the approach to duty modifications with initial engagement taking place with Support Superintendents.

3. KEY DATA AND INSIGHT

3.1 As at the end of June 2025 there was a total of 2,553 officers in roles related to their requirement for duty modifications. The table below outlines how this is split by category.

Category	Description	Number (%)
Recuperative	Duties following injury/accident/illness where officers is preparing to return to full duties.	653 (24.8%)
Adjusted	Duties following workplace/reasonable adjustments to overcome barriers to working for individuals awaiting assessment to see whether they have permanent disability/injury/illness that permanently prevents them fulfilling the full remit of their role.	1,544 (60.5%)
IHR Retained	Medically assessed as having a permanent disability preventing them from fulfilling a fully operational role, but approval has been provided by SPA to retain the officer in suitable role as opposed to IHR	46 (1.8%)
Protected	Related to modifications as a result of an expectant/nursing mother's risk assessment	158 (6.2%)
PSD Restricted	Duties where an individual is allocated in circumstances in which: verifiable confidential or source-sensitive information or intelligence has come to the notice of the service that questions the suitability of them to continue in their current post; or where serious concerns are raised which require management actions, both for the protection of individuals and the organisation.	152 (5.9%)

3.2 When considering the outcome of the reflection session the following is also relevant

Officers requiring duty modifications currently in supernumerary posts	• 336 (13.2% of all cases)
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Officers who are deployable with restrictions although are deployed into 'Admin Only' roles	<ul style="list-style-type: none"> • 969 of all officers requiring duty modifications (37.9% of all cases) are deployable with restrictions • Of those that are deployable with restrictions 698 are in 'admin only' roles (72.1% of all those who are deployable with restrictions)
Length of time spent in recuperative duties	<ul style="list-style-type: none"> • Average length of time in recuperative duties is 260 days • 154 (23.8%) have spent more than 12 months in recuperative duties
Length of time spent in adjusted duties	<ul style="list-style-type: none"> • Average length of time in adjusted duties is 973 days
Reviews	<ul style="list-style-type: none"> • 16.9% of duty modification reviews are overdue and 4.8% of cases don't have a review date

- 3.3 Based on the data and considerations at the reflection session there is an immediate need for more detailed consideration to ensure reviews take place with particular priority give to those that
- currently work in a supernumerary role;
 - have required duty modifications for an extensive period of time (including those on recuperative duties for more than 12 months);
 - are deployable with restrictions and are operating in an 'admin only' role; or
 - have reviews that are overdue or where no review date exists.

4. NEXT STEPS

- 4.1 The next steps have been largely influenced by existing plans, the outcome of the reflection session and insights from the key data outlined in section 3.
- 4.2 This has been split into immediate steps and longer-term steps in recognition of the importance of ongoing work linked workforce modernisation.
- 4.3 Immediate Steps
- A deep dive into identified prioritised cases of duty modified officers – 'long standing' situations (particularly in non-warranted roles), potential for a further OH referral, to bring forward to the panel for consideration
 - Seeking to reduce/minimise the number of officers requiring duty modifications that are working in a supernumerary post with clear

rationale available for any that require to remain in a supernumerary post

- Development of clearer rules/guidance/governance in relation to the creation of new arrangements and ongoing reviews in relation to officers requiring duty modifications
- An improved understanding of the roles that officers in duty modifications are carrying out with a particular focus on understanding the types of roles that are included as 'admin only'
- Progressing reviews in priority areas i.e. supernumerary posts, on duty modifications for extensive period of time and where reviews are overdue or review dates don't exist
- Continued engagement with Optima Health to ensure full consideration is taken of the capabilities required of an officer as part of medical assessments/advice
- Session with Support Superintendents prior to broader and improved communication to the organisation
- Implementation of Centralised HR Case Team to support end-to-end process for dealing with all matters related to attendance management, duty modifications, reasonable adjustments and Ill Health Retirement

4.4 Long-Term Steps

- Progression of work in relation to workforce modernisation through the consideration of roles that should be carried out by police officers or police staff
- The development of a process that seeks to allow the ability to offer vacant police staff posts as an alternative to exit via resignation, performance regulations or Ill Health Retirement

5. FINANCIAL IMPLICATIONS

- 5.1 There are financial implications in this report. There is an important need to consider any implications associated with any increase in Ill Health Retirals and resultant budgetary cost pressures. This would need to be managed and controlled in line with overall funding available in the relevant budget year.

6. PERSONNEL IMPLICATIONS

- 6.1 There are personnel implications in this report and these are fully articulated throughout the report.

7. LEGAL IMPLICATIONS

7.1 There are legal implications in this report. There is a clear need to balance legal requirements in relation to reasonable adjustments alongside the focus on increased capacity to deliver policing

8. REPUTATIONAL IMPLICATIONS

8.1 There are reputational implications in this report. These link to reputational impacts associated with adhering to legalisation alongside the need to ensure effective service delivery.

9. SOCIAL IMPLICATIONS

9.1 There are no social implications in this report.

10. COMMUNITY IMPACT

10.1 There are community implications in this report. This relates to the important need to ensure policing maximises its capacity to deliver effectively for communities.

11. EQUALITIES IMPLICATIONS

11.1 There are equality implications in this report. This relates to the need to ensure appropriate consideration of reasonable adjustments.

12. ENVIRONMENT IMPLICATIONS

12.1 There are no environmental implications in this report.

RECOMMENDATIONS

Members are invited to discuss this report

Appendix A: High-level modified officer workstream objectives

Note: The below are initial high-level objectives for comment. A comprehensive tactical action plan and associated timeline will be developed to inform delivery of these objectives.

Maximise organisational capacity prior to workforce modernisation
Enhance data/insight approach to drive understanding of current position, improvement action and assessment of impact
Ensure reviews are progressed in priority* areas which will focus on: <ul style="list-style-type: none">• Adjusted officers• Those in supernumerary posts• Those who are non-deployable or deployable with restrictions but within Admin Only roles• Those who have been in adjusted roles for at least 3 years• Those where review dates are overdue/no review date <p>*Those who meet the threshold for multiple bullets would be prioritised</p>
Review of those on recuperative duties for more than 12 months to consider if defined correctly and/or any trends that outline reasons for being in recuperative roles for extensive period
Ensure agenda and focus of Duty Modifications Panel is driven by review of cases in priority areas
Develop greater understanding of types of roles that are included as 'Admin Only' for those deemed 'deployable with restrictions'
Consider extent those on duty modifications who are deployable with restrictions can and are deployed for events to support overall operational capacity
Engagement with Optima Health to consider potential for increased demand for services as part of prioritisation programme
Ensure clarity and consistency in approach
Development of clearer rules/guidance/governance in relation to the creation of new arrangements and ongoing reviews of officers requiring duty modifications (supported by clear guidance on appropriate approach to reasonable adjustments based on current operating model)
Continued engagement with Optima Health to ensure full consideration is taken of the capabilities required of an officer as part of medical assessments/advice
Prepare for Workforce Modernisation
Work to understand and define how approaches to reasonable adjustments may change through target operating model (i.e. where officer deployment is focused on roles that required warranted powers and/or specialist knowledge and experience)

OFFICIAL

Identify priority posts currently carried out by police officers that would be priority areas as part of new target operating model to be carried out by police staff
Consider requirement for flexibility in resourcing to ensure ability to support those in protected or recuperative duties in new target operating model
Develop a process that seeks to support the ability to offer vacant police staff posts to officers on duty modifications following consideration of IHR/Capability
Take 'service design' approach to ensure the most appropriate approach to duty modifications/reasonable adjustments is taken at the point where workforce modernisation takes place
Engage with Scottish Police Consultative Forum on review of PNB guidance related to Ill Health Retirement
Develop Police Officer Role Profiles that help establish whether officer or staff roles are most beneficial aligned to organisational design principles
Ensure appropriate approach to Communication, Engagement and Training
Initial Engagement Session with Support Superintendents along with development of ongoing engagement as progress is made in relation to workforce modernisation
Input to Senior Leaders Forum to outline direction of travel
Set up ongoing engagement structure with Statutory Staff Associations and DACA
Specific engagement with Trade Unions related to process to consider use of vacant police staff roles
Consider approaches to gather insights from workforce re lived experience
Develop and implement communication plan for wider workforce and management
Develop and implement training plan for FLMs and wider organisation