

## Proposed Restructure of NSW Police Firearms Registry - Consultation and Placement Strategy

### Background and Reason for Change

In September 2018, the position of Director – NSW Police Firearms Registry was replaced with a Police Commander (Superintendent). Following a number recent internal reviews of existing systems, processes, structure and workload; as well as a formal audit conducted by the Audit Office of NSW, it is clear that there is an immediate need to streamline processes, improve transactional efficiencies, enhance decision making capabilities, increase compliance-based activities and strengthen the controls that govern the issuing of firearms licences and permits.

The Commissioner has endorsed the new (proposed) structure, thereby granting in-principle approval to commence the consultation process with employees and key stakeholders.

The key features of the new structure are as follows:

(a) The establishment of four (4) clear distinct functional arms, each having a dedicated line-manager to provide greater oversight of critical activities:

- **Business Services Unit**
- **Licensing & Compliance Unit**
- **Industry Regulation & Engagement Unit**
- **Governance & Quality Assurance Unit**

Each of the tiers are structured to complement the end-to-end-point workflow processes across the registry, ensuring that all decision-making and approval processes are aligned with the recently introduced *Risk Based Workflow Process*.

(b) Aligning the existing position of *Manager – Business Operations* (to be re-titled *Manager – Business Operations & Policy*) alongside the Commander. This will allow a more strategic and overarching role dedicated to maximising the relationships and workflows across all parts of the business. This will also allow more time for the development of policy proposals, oversight major projects and provide support to the managers of each of the four functional arms of the business.

(c) The creation of a new senior management position of *Manager – Compliance & Quality Assurance* responsible for ensuring good governance practices are implemented and maintained across all facets of the registry. This includes the development, implementation and ongoing maintenance and auditing of systems and processes to ensure that the registry can effectively satisfy its role as the regulator responsible for administering the array of prescribed governance functions outlined in the *NSW Firearms Act (1996)* and *Weapons Prohibition Act (1998)*.

(d) The creation of the role of a team of *Senior Adjudicator* to be introduced across a range of sub-units, to support the recently introduced *Risk Based Workflow Process*. This will result in an additional layer of adjudication that will quality review the more complex determinations (i.e. mental health, public interest test, non-disqualifying CNI history). The *Senior Adjudicators* will oversight a team of *Adjudication Officers*, providing more support and will include the task of dip-sampling the determinations made in respect of baseline transactions. All *Senior Adjudicators* will be provided with further training to enhance decision making capabilities and will be positioned across all phases of the workflow process.

- (e) The placement of the *Internal Review Team* into fourth functional arm of the business under the *Manager – Governance & Quality Assurance*, to ensure independence of line-management and the internal review process. This was previously grouped under the same manager responsible for the business units that made the original determinations.
- (f) An increase in the number of personnel attached to the *Firearms Tracking Unit* to improve our capability to verify the movement of firearms across jurisdictional borders.
- (g) The removal of several silos across the registry through the establishment of generic pools of personnel (Clerk 1/2 and Clerk 3/4) that service a range of units within the registry, allowing personnel to be re-deployed throughout the registry to address changing demands and priorities. Generic titles have been applied to all Clerk 1/2 (*Administration Assist*), Clerk 3/4 (*Adjudication Officer*) and Clerk 5/6 (*Senior Adjudicators*) in-line with the GSELA reforms. Personnel will be cross-trained to perform a number of functions.
- (h) The creation of the role of *State Co-ordinator - Compliance & Intelligence* dedicated to enhancing communication with the field (PACs, PDs, RLCs, Licensing personnel, Intelligence units) as well as the planning and co-ordination of intelligence-led compliance operations. The registry's existing (overstrength) Sergeant position was created to co-ordinate the recent National and State-based Firearms Amnesties, with both operations having ended.
- (i) The creation of a dedicated *Permits Unit* to oversight the administration of all permits issued in accordance with 28G Firearms Act 1996. Currently several units across the registry issue permits. The centralization of these transactions will improve the administration and regulation of this task.
- (j) The creation of *Field Compliance & Enforcement Officers* to enhance our support for the field and increase the level of registry-led compliance-based activities.
- (k) The creation of a *Business Reception Team* formed through an amalgamation of personnel currently performing duties in call centre and data capture unit. Personnel will be cross-trained to perform all functions. As a result of entering a partnership with *PoliceLink Command*, all customer (Firearms Licence holder) telephone enquiries are now administered by that command. The registry-based call centre will focus on providing an enhanced service to our premium customers, being police and industry (clubs, ranges and dealers).
- (l) The transfer of some generic corporate business functions to Shared Services i.e. inwards (hard-copy) mail, general finance, with no loss of positions to the registry.
- (m) Retaining a unit of personnel within the registry that will co-ordinate the receipt of mail from Shared Services, whilst overseeing the implementation and ongoing maintenance of the processes associated with the introduction of a digital-mail platform.
- (n) The removal of all *General Scale* positions from the business unit, to be replaced with Clerk Grade 1/2 (Administrative Assistant) positions, resulting in personnel with enhanced capabilities being able to be deployed to perform a greater range of baseline functions across the business unit.

## Consultation and Communication

Information will be provided to the NSW Public Service Association (PSA) and the Police Association of NSW (PANSW) prior to the dissemination of any information to employees.

Individual meetings will be held with directly affected employees followed by information sessions to all employees across the Command. There will be a two-week consultation period for feedback and comment. Information to be provided includes:

- The new structure and rebranding of the Firearms Registry to Firearms Licencing & Enforcement Directorate
- The expected benefits to the Registry / Directorate
- Placement strategy for employees
- Promotional opportunities
- Implementation timeline
- Contact details for welfare and support

There will be a central contact point for questions raised throughout the consultation period to ensure consistent messaging is provided and shared across the Registry / Directorate.

## Placement Strategy

The following placement strategy will occur:

1. Ongoing employees whose roles are not affected by the restructure will remain within the new structure at their substantive grade. This may include placement into a role with a different title or reporting line but substantially the same skills and capabilities.
2. All ongoing Clerk General Scale employees will be directly appointed to Clerk 1/2 Administrative Assistant roles in the new structure (*unless promoted via a Talent Pool*).
3. Where there are roles that are 'split grades' i.e. Clerk 2/3 or Clerk 4/5, ongoing employees will be differentially appointed to roles within one grade i.e. Clerk 3/4 or Clerk 5/6, that have similar skills and capabilities.
4. Affected employees who are unable to be placed at grade in the new structure, and who are interested in lower graded roles, are to be considered for roles where they meet the skills and capabilities, prior to the activation of a Talent Pool or merit recruitment process.
5. Activation of Talent Pools to fill vacant Adjudicator Clerk 3/4 and Senior Adjudicator, Clerk 5/6 roles.
6. Placement of long-term temporary employees who have been engaged through a comparative merit assessment process. Where there are more long-term temporary employees than positions available at grade, an EOI process will be undertaken to fill these roles.
7. Remaining vacant positions in the new structure will be available to ongoing Registry / Directorate employees for lateral transfer 'at grade' by way of an EOI process, on the basis that they have the requisite skills and capabilities to perform the role. Any remaining unfilled vacancies will be advertised within NSW Police Force.

8. Once the restructure has been finalised, any ongoing employees who cannot be placed into the new structure will be managed in accordance with the Managing Excess Employees Guidelines and provided with the opportunity of redeployment or Voluntary Redundancy.
9. Any temporary employees/contractors not placed to cease employment on implementation of the new structure ('Go Live').

### **Implementation Timeline**

The final structure will be determined at the end of the two-week consultation and feedback period and then communicated to all employees.

The following are approximate timeframes for the key milestones:

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| • Union consultation   | 2 July 2019    |
| • Information sessions and employee consultation begins          | 2 July 2019    |
| • End of two-week consultation period                            | 16 July 2019   |
| • Commencement of Placement Strategy                             | 17 July 2019   |
| • Build of new structure in SAP commences                        | End July 2019  |
| • Effective date for appointments                                | 12 August 2019 |
| • Any ongoing employees not placed are declared excess           | 12 August 2019 |
| • Temporary employees/contractors not placed to cease employment | 30 August 2019 |
| • 'Go live' date for new structure                               | 30 August 2019 |

Following the appointments (proposed 12 August, 2019), phase one of the planned staff training and development program will commence and will be facilitated over the course of the initial two-week period.

### **Regional impact statement**

There is no reduction in ongoing positions in regional areas as part of the Firearms Registry restructure.

The new structure provides promotional opportunities for existing employees and the ability to employ additional people from the local area, of which a number were applicants for the recently advertised Talent Pools.

All roles within the new structure will be ongoing, which will provide employees with greater stability and certainty regarding their employment. This will have a positive flow-on affect to the local businesses and communities, as increased job security may result in both current and any new employees formally relocating to the regional areas.

### **Attachments**

- Summary table of positions / grades (current & proposed)
- Organisational charts (current & proposed)