

**Policing in the 21<sup>st</sup> Century: Reconnecting Police and the People**  
**MPA Member Response - DRAFT**

1. This is the response of the Metropolitan Police Authority (MPA) to the coalition Government's plans for police reform, as set out in the paper entitled 'Policing in the 21<sup>st</sup> Century: reconnecting police and the people'. That paper posed a number of specific questions at the end of each chapter. The MPA's responses to these questions are set out at Annex A and further detail is provided at Annex B. This covering paper sets out general considerations regarding the way in which the Government's proposed reforms might most effectively be implemented in London.
2. London is in a different position from the rest of country in terms of existing local government structures, providing a unique opportunity to put the structures envisaged within the Home Office paper into effect relatively simply. With fully functioning regional structures and an elected mayor in place, London can quickly adopt the principles of directly elected accountability for policing. The Greater London Assembly provides a ready-made scrutiny function, capable of ensuring open and transparent accountability, and providing the necessary checks and balances on the exercise of the Police and Crime Commissioner's (PCC) functions.
3. London is also different in that the Metropolitan Police Service (MPS) has a range of national and international responsibilities for which it will be necessary to put in place accountability mechanisms.
4. The MPA regards it as important that the principles of effective corporate governance and democratic accountability should be consistently applied throughout the country. These principles include: transparency, public accessibility of information, responsibility for community safety and criminal justice, independent scrutiny, value for money, management of risk, maintenance of probity and public accountability to the electorate.
5. We would hope that the Bill presented to Parliament will be fundamentally enabling rather than prescriptive in respect of the ways in which reforms are made to work. In London, the Mayor should be the PCC, with a power to designate a nominated person to discharge the functions of this role. It is simply impracticable for the Mayor - with his or her many other responsibilities - personally to discharge all the responsibilities of the PCC. As the elected individual, responsibility and accountability should nonetheless remain ultimately with the Mayor. It is for consideration whether some functions, possibly including the selection and dismissal of the MPS Commissioner, should remain the responsibility of the Mayor, not to be delegated. It is also for consideration whether the individual designated by the Mayor must be an elected politician. If so, Assembly Members should be eligible.
6. The MPA, in its short life, has made a significant impact on the way in which the MPS has shaped its priorities and conducted its business. Some of these achievements are set out later in this paper. It is important that the PCC in London, as elsewhere, has at the very least the same powers that police

authorities currently possess, in order to ensure that they can be equally, if not more, effective. To this end, the PCC must be a legal entity with a range of powers and levers to guide and steer performance of the service, including:

- Setting the strategy
  - Setting the priorities and performance outcome
  - Setting the standard
  - Holding and controlling the budget
  - Owning the assets
  - Owning and controlling the estate
  - Employing police staff
7. The PCC should have the capacity to delegate as appropriate the functions and responsibilities which pertain to him or her as the body corporate to the MPS Commissioner.
  8. Given the scale of responsibilities in London, overseeing a budget of £3.6 billion and a workforce of over 52,000, it seems desirable that the PCC should have a non-executive advisory board, to be named the Mayor's Police and Crime Commission, to support him or her. It is for consideration whether the Home Secretary should make an appointment to the Board to reflect his or her responsibilities for national and international policing functions of the MPS. Appointments of 'Assistant Commissioners' to the Commission should be a matter for the Mayor, subject to Nolan principles. Whilst again there should be no constraints on eligibility, any Mayor would be well advised to make appointments from those with appropriate expertise – potentially to include former independent members of the MPA - and to take the opportunity to ensure representative diversity in the oversight of London's policing, including members of other tiers of London Government.
  9. As far as is possible, the business of the Commission should be conducted openly and in public. The executive decision-making capacity of the PCC would be subject to the Freedom of Information Act, which requires publication of all documents unless exempt, including meeting minutes, under the publication scheme and provides individuals or organisations with the right to request information held by a public authority. There would need to be systems in place to respond to these and any requests made under the Data Protection Act.
  10. Experience to date has demonstrated that it is essential to separate post hoc scrutiny from executive decision-making. As such, any Assembly Members on the PCP should not be eligible to be members of the Police and Crime Commission. The power structure within policing is complex and whilst there are pitfalls in seeking to be too prescriptive regarding such concepts as operational responsibility, it is necessary to provide checks and balances in the shape of independent executive control over police budgets and assets. Without the power to determine, as a matter of last resort, where resources are directed, the PCC's capacity to ensure that the democratic mandate upon which he or she is elected can be adequately fulfilled will be constrained.

11. Similarly, it is important to avoid confusing the scrutiny function of the GLA panel with the executive decision-making capacity of the PCC. To ensure financial probity and the avoidance of conflicts of interest the PCC will require statutory officers (including a finance officer to fulfil the role of a s151 officer under current local authority legislation) separate to those performing similar roles within the GLA. He or she will also require the capacity to manage audit, risk, and assurance independently of the force. None of this need add to bureaucracy, and resource neutrality could be achieved through increased cost effectiveness resultant from the sharing of services. Under the proposed model some of the staff currently working in finance and estate management within the MPS might be deployed to work directly for the PCC.

### **Roles and responsibilities**

12. In addition to the fundamental responsibilities of the PCC to set priorities and to control the budget, there are a number of functions that need to be discharged. The PCC should be able to make recommendations to The Queen regarding the appointment of the Metropolitan Police Commissioner and Deputy Commissioner, taking into account the representations of the Home Secretary, and should have the power to dismiss the Commissioner. There should also be a requirement in place for the PCC to approve appointments made by the MPS Commissioner of Association of Police Chief Officers (ACPO officers) and senior police staff. An independent element in the regulation of professional standards and conduct matters relating to ACPO officers is a matter of principle and a PCC role within this should be maintained. Linked to this is an argument for the PCC to have control over the system to respond to complaints and concerns about the quality of service throughout the police. Specific powers are needed in respect of engagement with local people and requiring the force to comply with equalities and diversity legislation. To fulfil national and international responsibilities, the PCC should be a statutory member of any oversight board to be established for the National Crime Agency, and the Bill should enable the PCC to establish arrangements to oversee criminal justice and community safety joint working in London. A statutory duty should be placed upon the Mayor as PCC to make adequate arrangements for CT and protective services. All of these roles and responsibilities require support staff with specialist skills in, for example, consultation with local people, planning, performance, finance, risk management, communications. Much of this exists currently and would need to be maintained and managed through the transition period so as not to lose the experience and expertise built over many years.

### **Scrutiny**

13. Scrutiny of the performance and decision-making of the PCC should be conducted by a panel of the London Assembly (the Police and Crime Panel (PCP) in the consultation document). In addition to regular public scrutiny sessions, the PCP should be a statutory consultee on strategic priorities that the PCC proposes for the MPS. It is for consideration whether the PCP should have the power to amend the strategic priorities. It is also for consideration whether the PCP should have additional powers, including for example the power to

require information, and the attendance at scrutiny meetings of the Mayor in person - accompanied by senior MPS officers as appropriate . Other functions which the PCP may require in order to discharge their duties include to confirm appointments to the Commission and to report the PCC to the Local Government Ombudsman for any alleged misconduct (not to the IPCC as envisaged in the consultation paper).

14. All of this will ensure that the PCC can represent the public interest, hold the MPS Commissioner to account and ensure value for money, whilst allowing the police to get on with operational policing.

### **Commissioner of Police of the Metropolis**

15. We recommend that the legislation place a duty on the MPS Commissioner to support the PCC in the discharge of his or her statutory responsibilities. It should also confer on the PCC a power of direction over the Commissioner in the event that such support is not forthcoming. On a point of semantics, we are extremely concerned that the new arrangements will create significant confusion in the minds of Londoners about the respective roles of the Mayor and the police. To mitigate this confusion we propose that senior ranks in the Metropolitan Police should be renamed, possibly as Chief of Police, Deputy Chief of Police, and Assistant Chief of Police, as or Director General of Police, Deputy Director of Police, and Assistant Director of Police, or that an alternative title for the Police and Crime Commissioner be devised.

### **Timing and transition**

16. Whatever timings are proposed must take into account the Olympics and other major events planned in 2012. Transitional arrangements must be suitably robust to allow business to be conducted effectively during the run-up to the Olympic and Paralympic games and following the comprehensive spending review.

### **MPA Successes**

17. The MPA developed Met Forward in April 2009, the three-year strategic mission to guide the work of the MPS. Recognised as an example of good practise in the recent joint HMIC /Audit Commission inspection of Police Authorities, it is underpinned by three strategic objectives - reducing crime and criminality, increasing public confidence in policing and providing value for money. Oversight and scrutiny of the programme is through the committee structure. Key outputs include improvements in the budget scrutiny process which is particularly relevant with increasing demands on public funding, greater focus on performance monitoring and service improvement.
18. When the MPA assumed the responsibility for financial management of the MPS, it had fewer than five qualified accountants, and very poor financial governance. The pressure exerted by the Authority, and on occasion, the withholding of resources, has led to significantly improved governance, internal controls and a better skilled workforce. Overtime, whilst still an issue in some parts of the

organisation, is now being addressed and procurement processes are significantly more robust.

19. The MPA has driven a change in culture to recognise and meet the needs of the diverse people of London, including ensuring that the MPS addressed the recommendations in the Stephen Lawrence Inquiry Report. A focus on BME and female recruitment and a drive to employ PCSOs has changed the face of the organisation and helped to achieve policing by consent of local people. Examples of ensuring the MPS consider the impact on Londoners include the debate ahead of the introduction of Taser in 2004 and the development of the stop and search community monitoring network, which creates a forum for challenge and seeks to ensure stop and search is conducted in an appropriate manner.
20. The impact of MPA oversight of policing has changed the way policing services are provided and ensured they are effective and meet the needs of the users, including the development of the Havens (rape crisis centres), Safer Neighbourhood Teams and the Status Dogs Unit. The new Joint Engagement Meetings (JEMs) bring together all key local and pan London partners to problem solve local long-standing issues and allow the MPA Chair to identify areas of concern that need to be taken forward in other strategic pan London forums. These meetings could be developed further to allow public access, to provide greater local accountability. In respect of counter terrorism and protective services, the MPA has been at the forefront nationally in improving accountability in this area, from agreeing performance information to be discussed in open session to establishing national and local counter terrorism oversight arrangements.
21. The Authority has significantly improved information available to local people, including simplifying the presentation of crime data, webcasting police authority meetings and being at the forefront of local crime mapping.
22. Audit, risk and assurance is an area of intense focus resulting in improvement in areas of corporate controls, risk management and the prevention and detection of fraud. The MPA owned whistle blowers help line has resulted in identification of potential malpractice in MPS professionals and areas of non compliance and fraud, saving and recovering the public purse hundreds of thousands of pounds.
23. The MPA's statutory Independent Custody Visitor (ICV) scheme is by far the largest in the country and is recognised as an innovative and positive example of volunteer management and cooperative partnership with the MPS.
24. It is vital that structures and processes to ensure the continuation of these and other successes and achievements of the MPA be built into the new arrangements for London.

## Annex A: Response to Consultation Questions

### Chapter 2

#### 1. Will the proposed checks and balances set out in this Chapter provide effective but un-bureaucratic safeguards for the work of Commissioners, and are there further safeguards that should be considered?

- Although combining the roles of Mayor of London and Police and Crime Commissioner is both logical and attractive, it does dilute the efficacy of the ultimate safeguard of the ballot box in judging the success or failure of the PCC given that will not be the only factor on which the electorate will decide to vote. Nonetheless it is a powerful motivator for the incumbent to demonstrate how well he or she has performed in setting strategic direction and holding the MPS Commissioner to account.
- The GLA scrutiny arrangements have already provided evidence that robust public scrutiny can be effective. Making that panel a statutory consultee on the strategic priorities and giving it a power to hold confirmatory hearings for appointees to the Mayor's Police and Crime Commission would provide extra safeguards against potential abuse of the PCC's position.

#### 2. What could be done to ensure that candidates for Commissioner come from a wide range of backgrounds, including from party political and independent standpoints?

- It is unlikely in London that any influence can realistically be brought to bear on the selection of candidates for the Mayoralty and hence the PCC.
- Without being overly prescriptive, legislation could provide that, in making appointments to the suggested advisory, non-executive body to support the PCC, the Mayor should have regard to a range of considerations for suitability, including diversity, experience, skills and representativeness.
- It is for consideration whether former police officers should not be eligible to stand for election as a PCC, since this would unbalance the relationships and potentially confuse the electorate.

#### 3. How should Commissioners best work with the wider criminal justice and community safety partners who deliver the broad range of services that keep communities safe?

- The PCC should lead a board (for example the London Crime Reduction Board that is being developed currently) with senior representatives from every part of the criminal justice sector with the authority and funding to provide a mechanism to bring together criminal justice and community safety agendas in an 'end to end' model that delivers value for money.
- This model should be mirrored at borough level to ensure seamless transfer from local to regional, with a route for local areas to the PCC and a structure for borough level agencies to commission services jointly across the CJS spectrum, making better use of revenue, capital and officer resources.

- Currently MPA members act as a conduit between community safety partnerships and the MPS Commissioner. Under the new structure members or staff of the Commission could continue this role.

**4. How might Commissioners best engage with their communities – individuals, businesses and voluntary organisations - at the neighbourhood level?**

- To facilitate strategic engagement we propose the creation of shared borough engagement hubs with partners, building on the safer neighbourhood panels, which will feed into an area level network aligned to the MPS' command areas.
- Mechanisms would need be put in place to provide appropriate support to the voluntary sector to ensure that they are able to contribute their views, advice and guidance effectively.
- Given the size and scale of the Metropolitan Police District it is impracticable to expect direct engagement by the PCC or his or her representatives at neighbourhood level. But there should be a duty on the PCC to ensure that the police are effectively engaging at this level. Fixed term appointments of 5-6 years for borough commanders might be considered to enable greater continuity in the relationships between the police and local people.

**5. How can the Commissioner and the greater transparency of local information drive improvements in the most deprived and least safe neighbourhoods in their areas?**

- Data which the public trust must be used effectively to target resources and effort where it is most needed. In practice this would mean providing local data, with an additional focus on the comparative data of the best and worst neighbourhoods.
- Relevant diversity data should be collated and monitored to ensure equality of access and the development of appropriately targeted services. This is also particularly important in the context of London's diverse communities and their historical experiences and understanding of policing and community safety by different groups.
- Participatory budgeting would enable local people to influence the allocation of resources.

**6. What information would help the public make judgements about their force and Commissioner, including the level of detail and comparability with other areas?**

- Open and transparent provision of data is the key to helping people judge how well the PCC and the panel is performing. A range of data sets could be made available to the public for this purpose (see Annex B for suggestions), but it would probably be most useful to the public to provide just four or five indicative headline figures about the crimes that matter most to the people. If people are to trust and support the police they need more than just crime and value for money data.

- In London a range of diversity data is essential to ensuring effective and confident policing. While we accept the need to reduce bureaucracy, the collection of stop and search data, for example, should retain its alignment with the Equalities and Human Rights Commission's 16+1 self-defined ethnicity codes. With the addition of better technological support bureaucracy could be effectively reduced without completely removing the opportunity to maintain appropriate checks and balances.

### Chapter 3

#### 7. **Locally, what are examples of unnecessary bureaucracy within police forces and how can the service get rid of this?**

- We have a number of detailed suggestions for opportunities to cut bureaucracy in the police service, as set out in Annex B.

#### 8. **How should forces ensure that information that local people feel is important is made available without creating a burdensome data recording process?**

- Local people should decide on what information they require and how they receive it. Views can be sought through existing structures and greater engagement with the voluntary and community sectors.
- Stop and search data should continue to be collated to ensure that disproportionality issues are monitored and addressed.
- Consistency of data is important to ensure comparability

#### 9. **What information should HMIC use to support a more proportionate approach to their 'public facing performance role', while reducing burdens and avoiding de-facto targets?**

- The MPS/MPA Met Standards work to recognise and reward excellent performance and efficiency could support this.
- This should be determined around a core of basic information sets across all forces, taking into account the collaboration required for regional and national issues.

#### 10. **How can ACPO change the culture of the police service to move away from compliance with detailed guidance to the use of professional judgement within a clear framework based around outcomes?**

- Although ACPO must take the lead on this, much of the current bureaucracy and culture of the police service has been generated by ACPO, which is essentially a staff association representing chief police officers. It follows that the impetus for changing police culture must include a significant independent element and that PCCs have an important role to play.

- We support a move towards greater use of professional judgement, whilst not losing the command and control model, which is needed to ensure a consistent service and no abuse of police powers. The PCC needs to have the powers to work with officers to examine internal processes and doctrines which lead to unnecessary bureaucracy.

**11. How can we share knowledge about policing techniques that cut crime without creating endless guidance?**

- Knowledge can be shared by encouraging the creation of virtual forums and networks. The 'crime reduction web' was an example of a trusted, reliable source of guidance and ideas.
- It would help to have a single recognised tool to evaluate against a framework and then store good practice, for example the London Mayor's Project Oracle.
- HMIC could assist with sharing best practice between forces as well as providing advice and support to PCCs.

**Chapter 4**

**12. What policing functions should be delivered between forces acting collaboratively?**

- We believe that all services could be considered for collaboration between forces. Support functions such as provision of uniforms, fleet management, crime management services, ISIT and procurement could be looked at initially, together with operational policing functions, such as mounted police and air support.
- Criminal justice partners and local authorities should be encouraged to work collaboratively with, and purchase services from, the police service, such as IT, procurement, transport, warehousing, language services, catering, etc.
- The legislation should not rule out collaboration of shared services with partners outside the police family, such as, in London, Transport for London.

**13. What are the principal obstacles to collaboration between forces or with other partners and how they can they be addressed?**

- Multiplicity of funding streams, accounting and procurement processes are significant barriers. Such issues could be resolved by allocating the funding for partnership activity (over and above core budgets) to the PCC as the single responsible authority. This is the structure being proposed for the London Crime Reduction Board, which could be mirrored at the borough level.
- The unwillingness of Chief Constables to collaborate, given their preference to run their own services, may also be an issue which points to a need to give powers to the PCC to ensure this does happen.

**14. Are there functions which need greater national co-ordination or which would make sense to organise and run nationally (while still being delivered locally)?**

- Everything will benefit from national and regional co-ordination and information sharing. Nothing is demonstrably disadvantaged under the current arrangements but collaboration is always to be encouraged.

**15. How can the police service take advantage of private sector expertise to improve value for money, for example in operational support, or back office functions shared between several forces, or with other public sector providers?**

- Given the PCC's personal responsibilities for ensuring value for money at the local level, he/she will want to ensure that the force is maximising all opportunities to drive effectiveness. The police service can tap into private sector expertise to look critically at the roles being undertaken by police officers in operational and business support functions and remove them from unnecessary administrative duties and routine tasks where their skills and powers are not properly used. Police staff should be used for time-consuming functions previously performed by officers.
- The MPS is a large enough force to manage or run services on behalf of other forces and should be encouraged to do so as part of a more innovative approach to shared services and/ or income generation.
- Business and management training are areas where forces could consider using the private sector to provide the service at both a local and national level, for example ACPO training, subject to minimum levels.
- PCCs should also be encouraged to assume some of the responsibilities currently being carried out by the NPIA.

**16. Alongside its focus on organised crime and border security, what functions might a new National Crime Agency deliver on behalf of police forces, and how should it be held to account?**

- The NCA should be transparently accountable to an oversight body with full tripartite membership, including a statutory place for the London PCC in view of the significant links between the NCA and MPS.
- Transitional/ interim arrangements will be required for those operational functions of the NPIA that are transferred to the NCA during the intervening period of March 2012 and April 2013.

**17. What arrangements should be in place in future to ensure that there is a sufficient pool of chief officers available, in particular for the most challenging leadership roles in the police service? Is there a role for other providers to provide training?**

- A clear support and training structure to enable officers to have the capacity and capability to perform at a senior level is required. The emphasis should be on developing professional police leaders not just police leaders and there may be a role for the private sector to help develop and mentor senior leaders. Leadership skills could be developed working with armed forces and the emergency services to reduce costs and duplicated effort. Leadership is generic, not police specific.
- With the abolition of NPIA there will be an opportunity for forces to have a greater say regarding the recruitment, training and promotion of its officers as opposed to centrally imposed rules and regulations.

**18. How can we rapidly increase the capability within the police service to become more business-like, with police leaders taking on a more prominent role to help drive necessary cultural change in delivering sustainable business process improvement?**

- Secondments of police leaders to outside businesses and business leaders into the force could be considered.
- Multi point entry, as recommended by the Mayor's Race and Faith Inquiry, will open up significant opportunities.
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**Chapter 5**

**19. What more can the Government do to support the public to take a more active role in keeping neighbourhoods safe?**

- Empower local people to take action, rather than just sitting on 'talk shop' committees.
- Sutton Council is one of the first pioneer 'Innovation Areas' bringing the Big Society to life. A number of new methods of engagement with local people and democratic involvement have been implemented and the success and learning from this should be shared.
- Provide better support to neighbourhood volunteers.
- Undertake a dedicated communications campaign regarding how to get involved.

**20. How can the Government encourage more people to volunteer (including as special constables) and provide necessary incentives to encourage them to stay?**

- The MPA has led a lot of work on volunteering. Key to success is:
  - Local recruitment.
  - Local management and supervision.
  - Structured induction and ongoing training and support (including annual reviews). Better support for police volunteers could be provided via senior police officers.
  - Identification and communication of the mutual benefits, for example

skills development or confidence building, as a way into paid employment or as a way of making their area a better place to live or work.

- For specials, free travel is a big incentive to volunteer.
- Provision of specific role profiles (risk-assessed where appropriate).
- Public recognition for volunteers' efforts, for example commendation ceremonies and letters of appreciation.
- For police volunteers, a route to joining the police service. The MPS is currently considering proposals to provide a route into entry into the regular service through entry as a special constable.
- Private or public sector opportunities for staff to volunteer and use as part of the appraisal process.
- Borough commanders to play a greater role in encouraging and welcoming (non police) volunteers of all ages and from all sectors of society.

**21. What more can central Government do to make the criminal justice system more efficient?**

- Ensure collaboration at the centre with external and private sector organisations.
- Encourage and support better end to end working between prevention, engagement and enforcement agencies.
- Ensure efficiency savings are redirected.
- Ensure all parties understand and deliver against their information sharing obligations. There is a potential danger in these difficult financial circumstances that individual organisations will retreat back to their own core issues so there is a need for a mechanism to keep organisations focussed on delivering together.
- Ensure all criminal justice agencies are working to the same targets.
- Support better monitoring of offenders who are out on licence

**22. What prescriptions from Government get in the way of effective local partnership working?**

- The removal of the plethora of targets in favour of identified outcomes will be helpful provided those outcomes are shared and understood as the sum of the efforts of all agencies.

**23. What else needs to be done to simplify and improve community safety and criminal justice work locally?**

- Broadly speaking, the local structures should mirror those being developed on a London-wide basis, i.e. the community safety partnerships and borough criminal justice groups should come together in one single commissioning structure to ensure more efficient and effective delivery.
- In addition, given that the London PCC will be responsible for policing across 32 boroughs, there is a need for a range of mechanisms to ensure the PCC

retains appropriate links to the borough level, both local authorities and local people. This will be achieved partly through links to London Councils and the local authority community safety portfolio holders. However, it will also be important to give the PCC a role on local community safety overview and scrutiny committees. Joint funding arrangements with the chair of the Local Criminal Justice Partnership to become a statutory partner on the CDRP.

### **Annex B: Detailed comments and miscellaneous issues for consideration**

#### **Data Sets**

It is clear that the Government wishes to empower local people through the open and transparent provision of data. A range of data sets could be made available to the public for this purpose (see list below for suggestions). All information should be provided within an operating context, so that people are able to understand what the data indicates. There also needs to be recognition that information should not be provided for its own sake. Information should be provided in a form that meets the needs of local people. It should be provided regularly and in a consistent format. Work undertaken by MPS Strategic Research and Analysis Unit has indicated that information provided, consistently, regularly and with context can help to drive confidence.

It is not clear whether the suggestion for 'information' for the public should be provided at a borough or a ward level. It may be problematic to provide such detailed information at a ward level. The legislation therefore needs to be clearer at what level this information needs to be provided. Not all data can be published at a local level, for example rape, so this data needs to be provided in a different format to enable the public to hold their PCC to account for all areas of crime and policing. The information could include:

- Number of offences recorded and offences brought to justice
- Number of arrests
- Police response time data
- Stop and search data (including diversity statistics)
- Value for money profiles
- Diversity of workforce
- Diversity of victims, witnesses and suspects
- Cost control, assessing and comparing cost and differences through benchmarking activities
- Number of police (including officers, PCSO, Specials) hours on the beat (not sure how easy it would be to provide this data on a regular basis, but useful if we're moving away from crude measure of no. of police officers), Staff availability, including shift patterns, level of specialisation, front line/back office staff ratios, bureaucracy, risk adverseness and visibility ratio
- Number of volunteer hours
- Preparedness (or lack thereof) for financial challenges ahead and risk awareness
- System architecture, including the underpinning regulatory regime of targets, productivity, incentive structures etc.
- Complaints data and how complaints have been dealt with

#### **Reductions in bureaucracy**

We have a number of suggestions for opportunities to cut bureaucracy in the police service.

### Pay and conditions for police officers and staff

- Abolish the Senior Appointments Panel for ACPO officers
- PNB/PAB – abolish centrally negotiated terms and condition or remove HO from Official side and leave to ACPO and APA
- Remove role of Home Secretary to ratify PNB agreements
- Establish a Pay and Conditions Review Body – Home Office not part of this body which leaves Home Secretary free to have the final word
- Amend accrual arrangements for pensions
- Implement Reg A19 for officers with 30 years service
- Abolish Special Priority Payments for police constable
- Abolish Competency Related Threshold Payments for those at the top of their pay spine
- Abolish housing and rent allowance for those officers still in receipt of allowances
- Abolish Post Related Allowances ('big job payments') for Chief Supts
- abolish bonuses and Performance Related Pay for Superintending and ACPO ranks
- Amend overtime regulations to provide for a single flat rate regardless of circumstances or notice period
- Abolish regional allowances, i.e. London Weighting, London Allowance, Location Allowance, South East allowance and introduce regional pay; allow local/regional negotiations based on a single national pay spine. Progression should be based solely upon performance and skills acquisition with no more than 5 spine points per rank.
- Introduce a 'Presence Allowance' only available for those who perform operational, 24/7 roles
- Scrap all other discretionary allowances
- Reduce number of ranks (Ch Inspector and Ch Supt ranks were deleted from the structure as a result of the Sheehy review but subsequently re-introduced)
- Encourage forces to adopt consistent models of supervision and 'spans of control' for Federated ranks thereby reducing management numbers
- Introduce an early leavers 'redundancy' package or short service payment for those who no longer wish to be police officers
- Bring most police terms and conditions under normal employee legislation
- Remove right to strike for key workers, e.g. PCSOs, DDOs, custody nurses
- Allow Chief Constables to implement shift patterns to match supply to demand and remove the need to 'agree' shift patterns with staff associations
- Abolish 10 hour and 12 hour shift systems which can result in officers having blocks of 5 or 6 rest days. This would lead to an increase in the number of shifts, reduced overtime and reduce the number of officers with second jobs
- Revise the provisions of the Police (Health and Safety) Act 1997, as currently constituted, as they apply to operational policing activities, e.g. Stockwell
- Renegotiate the Hertfordshire Agreement on mutual aid
- Abolish the Integrated Competency Framework and replace with 3 policing domains (leadership, business and executive policing skills)
- For all or most of the above use Home Secretary's determinations to introduce 'fast time' changes

### Professional Standards

- Police Pension forfeiture – abolish the requirement to apply to the Home Secretary for certificate of forfeiture (Reg K5(4))
- Business interests appeal – abolish the right of appeal to the Home Sec (Reg 7 (5))
- Restrict business interests further to prevent officers having second jobs
- Simplify complaints and conduct regulations for all officers
- Review role of IPCC

### Home Office

- Re allocate responsibility for data accuracy from HMIC/Audit Commission to local oversight bodies
- Abolish league tables/PPAF/ ADR returns and IQUANTA
- Abolish PSA, LAA measures
- Reduce duplication of functions and responsibilities between central govt and NDPBs for example Equalities and criminal/statistical information within the Home Office and the separate organisations of Equalities and Human Rights Commission (EHRC) and Office for National Statistics (ONS)
- Streamline funding process for CT and revise ACPO TAM to ensure effective governance and oversight
- Review protection arrangements and DSP funding
- Review and simplify funding formula
- Abolish ring fenced funding – just prescribe what has to be delivered
- Revise National Crime Recording Standards (NCRS)
- Abolish NPJA – MPS to undertake major ICT programmes and procurement, Police training delivered regionally through commissioned programmes, HMIC to incorporate improvement interventions, stop other activities such as SCAS, Digest
- Clarify role of SOCA and regional capability (use CT as a model)
- In light of announcements of Audit Commission clarify role of HMIC and NAO
- Abolish requirement for Police Authorities to submit policing plans to HO, and to produce an Annual report in a prescribed format
- Review added value of centrally led national boards and bodies
- Review and scrap doctrine, guidelines and best practice tool kits
- Stop plethora of publications all purporting to deliver good practice
- Commission others to do the work, not do it itself
- Ensure that consistent and complimentary targets are developed throughout the Criminal Justice System so that the police are not working to different targets to other CJS agencies (PPSO)

### Criminal Justice

- Create one overarching body in London
- Avoid perverse incentives re performance measures
- Fund the roll out of Virtual Courts
- Amend guilty plea tariff so that there is an increased tariff for changing from

not guilty to guilty plea on day of trial – try and discourage this practice as the cost to the criminal justice system is excessive and there is no penalty currently for the individual

- Increased use of joined up IT – link with court closure and video evidence giving

### Policing Model

- Construct a National Policing capability model to ensure that a minimum capacity and capability is retained for protective services and key police functions

### Other

- Abolish National Fraud Authority
- Review FOI – too many vexatious applications and /or media requests
- Review Health and Safety at work Act 1974
- Simplify and streamline public sector procurement regulations

## **What the PCC will need for effective oversight.**

### 'Soft' intelligence gathering

Gathering of intelligence cannot rely on formal reports alone. Acquisition of 'soft' intelligence should include:

- Attending meetings as a 'civil servant' rather than a personal advisor. This is likely to result in different information being forthcoming.
- Gaining information and finding out what is going on through contacts at different levels and different parts of the MPS.

### 'Hard' intelligence gathering

Data based intelligence gathering related to policing to include:

- Data gathering from MPS, LASS, TfL, CJS databases
- Report writing and analysis
- Research and oversight quality assurance of MPS research
- Best practice identified through UK and international research

### Consultation and surveys

PCC commissioned research to be carried out internally or by an external organisation. This to include:

- Oversight and quality assurance of PAS and other survey work
- Carrying out consultation for the policing plan
- Ad hoc consultation (eg on-line surveys, focus groups)

### JEMs and other problem solving improvement support

Utilising data and other information to facilitate problem solving and improvement work including:

- Providing JEMs for MPS and partners
- JEMs type support work for LCRB

### Performance oversight

Ensuring that MPS performance is meeting the needs of London and Londoners through various mechanisms including:

- Regular and ad hoc performance reports
- Monitoring crime trends
- Reporting on productivity/efficiency rates (eg SD rate per officer or costs per investigation)
- Involvement in MPS Performance management process such as KPRM

### Data accuracy

Without accurate data, oversight of the MPS becomes difficult if not impossible. The PCC will need to ensure the quality of data recorded and used by the MPS. This should include:

- Involvement in technical oversight groups
- Oversight of MPS data accuracy audit and management

### Planning

The PCC needs to ensure that the MPS has a workable short, medium and long term plan that meets the needs of Londoners and reduces the need to rely on reactive operations. This should include:

- Oversight of the planning process
- Being the 'voice of London' for the production of the plan
- Consulting on what is needed using surveys etc
- Ensuring that the plan is being implemented and deadlines are being met

### Customer Service

The PCC will need to ensure that the service level provided by the MPS is fit for purpose and that complaints from the public are dealt with. This will extend to those complaints that are outside the remit of the IPCC, such as complaints about process rather than behaviour. This will include:

- Developing customer service standards (inc identification of requirements through research)
- Oversight and monitoring of standards (inc working with MPS to improve standards)
- Development and management of complaints system for the PCC
- Development of easy access complaints route