

# Independent Review of Policing

## Association of Police Authorities

### Initial Submission

August 2007

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### Introduction

1. The Association of Police Authorities (APA) represents all police authorities in England and Wales; the Northern Ireland Policing Board; and the British Transport Police Authority. The APA also has as associate members the Civil Nuclear Police Authority; the Scottish Police Authorities Convenors Forum; the National Policing Improvement Agency; and Skills for Justice.
2. The APA welcomes this review as a timely opportunity to examine key aspects of policing and how we can take these forward to secure better policing for our communities.
3. The APA believes that, in doing so, it is important to take stock of the considerable achievements of the service over the past decade in implementing an ongoing major reform and change programme whilst at the same time continuously improving performance.
4. We welcome the recognition that it is crucial that this work has the ownership and support of all parts of the policing community, whilst also learning from elsewhere. The APA supports the Review's intentions to seek communities' input to its work and is keen to assist the Review to do this in anyway which would be helpful. We are also pleased that that the Review is to be subject to Equalities Impact Assessment and strongly support the importance of applying any such assessment to the Review's proposals.
5. The APA considers that it is crucial for the Review to bear in mind the extremely challenging financial situation facing the service over the forthcoming Comprehensive Spending Review (CSR) period. The APA would draw the Review's particular attention to the Joint APA/ACPO contribution to the CSR ("***Sustainable Policing***") which identified a potential funding gap of £1 billion over the CSR period. Likewise, the Review needs to equally recognise the very challenging agenda which the police service faces on Counter-Terrorism; and other Protective Services.
6. This submission outlines the APA's initial input to each of the four review strands. These have been presented separately for ease of reference, but the APA is strongly of the view that each of the strands is inextricably linked and they should be viewed across the piece and not in isolation.
7. The APA has been contributing views on an ongoing basis to the review through the various mechanisms and structures in place and has set up the APA Police Authority Reference Group and the APA Police Authority Practitioners Group to assist with this and has encouraged police authorities to also feed views into the review direct.

### *Timetable for the Review*

8. The APA believes that the timetable set for the Review to provide an interim report by the end of August and to report fully by the end of this year is extremely challenging. The

APA's strong view is that sufficient time should be allowed to enable the Review to provide considered insight and recommendations which will shape the future of policing.

*Available Information*

9. The APA is aware that the Review is collecting evidence from as many sources as possible, and would urge that consideration be given to key documentation already extant such as:
  - Report of the Independent Commission on Policing for Northern Ireland ("the Patten Report")
  - The White Paper – Building Communities, Beating Crime and the Formal Submissions made by the APA in response.
  - Good Governance Standard for Public Services produced by the Independent Commission on Good Governance in Public Services (2004).
  - The Joint Home Office/Strategy Unit Project and Report (unpublished) 2004
  - The Independent Review of the Selection and Appointment of Independent Members of Police Authorities (the Hamer Report) and the APA's formal Submission to the Review and formal response
  - The Joint APA/ACPO Submission on the Comprehensive Spending Review "Sustainable Policing" (2007) and the more detailed report of the Joint APA/ACPO Police Expenditure Group.
10. Whilst the APA would not necessarily endorse all the recommendations of these various papers and reports, it is suggested that these may be helpful in identifying for the Review a range of existing information and views which would be helpful to its deliberations.
11. This submission has been compiled following consultation with the APA's member authorities and following discussions and debate in various APA groups and forums. It has been endorsed by the APA Plenary - the APA's governing body on which all police authorities are represented.
12. The APA will continue to provide further input into the Review on an ongoing basis and will make a further formal submission following the Interim Report.
13. Any queries about this submission should be made to Fionnuala Gill, Executive Director, or Ian Barnes (020 7664 3178 [ian.barnes@lga.gov.uk](mailto:ian.barnes@lga.gov.uk)) at the APA Secretariat.

**APA Secretariat**  
**August 2007**

## Embedding Neighbourhood Policing

14. Police authorities are committed to neighbourhood policing. We are clear that it is what our communities want and have asked for over some considerable time. The APA considers that authorities and forces are to be congratulated on the successful roll out of neighbourhood policing to date which represents a significant achievement.
15. Neighbourhood teams are already making a big difference on the ground in communities. But, inevitably, also bring with them an increase in expectations and demand as confidence in local policing grows. So sustainability is a key issue going forward.
16. This review provides a crucial opportunity to look at how we integrate neighbourhood policing more fully with neighbourhood management. Many of the issues that concern communities require partner agencies working together more effectively on the ground to tackle social ills and difficulties, so that it is not just the police being left to pick up the pieces.
17. Neighbourhood Policing must be seen in the wider context of a citizen focused service to ensure that policing is truly focused on the diverse needs of communities.
18. In the APA's view, work on this strand needs to tie in closely with the local accountability strand in looking at how to enhance engagement and community involvement in having a say over the policing agenda at the neighbourhood level.
19. The introduction and recruitment of Police Community Support Officers (PCSOs) has been a major success story and PCSOs are a vital element of neighbourhood policing.
20. It is crucial that their presence in neighbourhoods is maintained and that they do not get drawn away from the frontline. There are some good examples of where authorities, such as Hertfordshire and Avon and Somerset to name but two, have used local targets to prevent abstractions eg not more than 5% abstraction rates or to ensure eg that 95% time is spent on foot patrol.
21. In some cases, this has also provided helpful in reassuring local partners who have contributed match funding. As all public services face a substantial financial challenge ahead, it must be recognised that the lack of certainty around future police funding for PCSOs is causing unease on the part of such partners who may be less keen to continue their contribution. Indeed, it should be recognised that the matched funding model has proved difficult to negotiate and created tensions for some partners.
22. A further key issue is to ensure continuity in neighbourhood teams to enable officers and staff to build relationships with the community. For example, there is a case for looking at ensuring a set tenure in neighbourhood teams, for a minimum of say two or even possibly three years. Indeed to take it a step further, this could be supported by considering the tenure of BCU commanders to ensure consistency in leadership and partnership working.
23. The contribution made by those in neighbourhood policing teams needs to be properly evaluated and recognised. Recognition need not be financial, but the work of those in

neighbourhood teams needs to be recognised alongside the more newsworthy work in response policing and other areas.

24. The skills and training needs of PCSOs and officers working within neighbourhood policing teams is essential in considering the impact on communities, for example, an understanding of the principles of community development and cohesion.
25. Community cohesion is a key issue in today's climate, especially from a policing and security aspect. The recent report from the Commission on Integration and Cohesion 'Our Shared Future' recognises the links to crime and disorder, the importance of engagement at neighbourhood level and of understanding communities. Neighbourhood policing is fundamental to a partnership approach, working with local authorities and the third sector, as well as communities themselves.
26. A key element of the success of PCSOs, has been the representation of both ethnic minorities and women amongst their ranks. Having a representative police service is key to the effective delivery of frontline policing services, and consideration should be given to making the transition from PCSO to constable one which potentially could prioritise individuals by recognising existing skills, expertise and experience. Indeed more generally there is a need to consider a career structure for PCSOs.
27. Properly integrating intelligence gathering and communication across a force is vital. The intelligence gathered by neighbourhood policing teams needs to be effectively collated and analysed and then passed to other units. Similarly, intelligence gathered and utilised in areas such as major crime and counter-terrorism needs to be properly communicated to neighbourhood policing teams. In this respect, it is important to identify the interdependencies between neighbourhood policing and other aspects of police force delivery and recognise how delivery in one area is required to support effective outcomes in another.
28. There is still in some cases a lack of clarity around some officer/PCSO roles and particularly understanding of the role of PCSOs on the part of officers.
29. It is important that the success of PCSOs in developing community relations and engaging with local people does not exclude officers from this sort of activity.
30. It is essential that officers also have a role in this area, so they are not simply seen as enforcement agents but equally are able to build relationships with communities. Again tenure and abstractions are key to this.
31. Lack of resources remains an issue. Proper investment is needed. There will be difficult decisions to be made by authorities and forces when PCSO funding comes to an end. As indicated above, given the financial difficulties being faced in other parts of the public sector, levering in funding from elsewhere will continue to represent a major challenge.
32. Issues regarding joint tasking of PCSOs need to be considered in the context of securing additional funding from local partners, particularly considering the role of PCSOs and ensuring they are supporting but not replacing the services for which other local agencies are responsible.

33. More needs to be done to understand, measure and monitor the outcomes and benefits of neighbourhood policing, if longer-term sustainability is to be achieved.
34. Performance management of neighbourhood policing - ie what is going on currently/how to develop this further; priority setting and performance management at the neighbourhood level needs to be joined-up at a more strategic level.
35. The need for neighbourhood policing to be provided in the context of neighbourhood management needs to be reflected in the performance regimes of partner agencies with a responsibility for providing neighbourhood management. The relationship with Local Area Agreements and CDRPs in this respect should be considered.
36. Both understanding and managing the expectations of communities is crucial to achieving the outcomes required of neighbourhood policing, such as increased confidence.
37. There is a need to recognise the difference between principles and the methods used to support the delivery them. For example, principles of community engagement and quality of service are applicable throughout the police service, and neighbourhood policing is just one mechanism to deliver these wider objectives.
38. Some areas of recruitment are having an adverse impact on certain sections of our communities and therefore blocking the development of representative neighbourhood policing teams. For example, '8 strikes and out' for mistakes on PCSO application forms; and the delay in experienced EU police officers, for example from Poland, from being able to join the UK police service when their cultural and language skills would be invaluable in policing our ever changing communities.
39. In some force areas there is concern about the effective delivery of the Police Race and Diversity Learning Development Programme (PRDLDP). This training programme is effective in giving the police service the awareness and understanding to work in and with diverse communities. In fact the ethos of the programme is for the involvement of communities throughout. The danger is that due to stretched budgets and under resourced training departments that some neighbourhood policing teams will not be getting the training they need, which may result in adverse impact in the delivery of neighbourhood policing for diverse communities.
40. It is crucial to ensure that any proposals build on what has already been achieved through effective integration, rather than move in a different direction. The key is to pursue every opportunity to ensure that neighbourhood policing is properly integrated into the wider force.

## Local Involvement and Accountability

41. The APA and all police authorities strongly support increased transparency and accountability of our policing services to communities and greater involvement by all diverse communities in our work.
42. There are many elements to this strand of the review. The APA would suggest that there is a need to start by asking the questions:
  - What needs to be fixed?
  - What is missing at present?
  - What needs to be clarified or changed?
43. Secondly, there is a need to consider what is meant by `accountability` given that is interpreted in many different ways and/or used interchangeably with a variety of other concepts such as answerability, engagement, and scrutiny. A common understanding and language is needed.
44. In our view, policing is, and should continue to be, a locally accountable service. The tripartite relationship provides for chief officers and forces to be accountable to local police authorities comprised of local people, not to central government. The anchor for this is "policing by consent":
  - *Lord Scarman in his 1981 report<sup>1</sup> noted that while the police should exercise independent judgment they were also servants of the community and could not effectively enforce their role without the support of that community. Successful policing involves partnership with the police and the community, government agencies and non-governmental organisations working in a way to respond to the community's needs.*
  - *The Report of the Independent Commission on Policing for Northern Ireland, the 'Patten Report'<sup>2</sup>, stated that policing is an integral part of the system of law which underpins society. The report goes on to say that the rule of law binds together a healthy, democratic society. In such a society the police are in a uniquely privileged position. It is their task to uphold the rule of law, exercising their independent professional judgment in doing so. That independence is rightly prized as a defence against the politicisation of policing but independence is not without the need for accountability. The Patten Report identifies that in Northern Ireland, where historically policing had had a history of being subject to either Unionist government political control at Stormont or direct rule from Westminster, the police had become viewed, not as upholders of the law, but as defenders of the state.*
45. Both of the above extracts recognise the need for a robust and successful tripartite relationship between government, police and communities to ensure that the police are not, and are not seen to be, politically partisan or controlled by Government.

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<sup>1</sup> The Brixton Disorders – Report of an Inquiry – The Rt Hon The Lord Scarman HMSO London 1981

<sup>2</sup> A new beginning: policing in Northern Ireland. Report of the Independent Commission on Policing for Northern Ireland. HMSO September 1999

46. The balance in the tripartite arrangements is fundamental when considered in the context of the underlying principle that policing in the United Kingdom is exercised with the consent of the public. Consent is not unconditional, but depends on proper accountability. The Patten Report states that this happens when communities recognise the legitimacy of the policing task, confer authority on police personnel in carrying out their role in policing and actively support them. The police are employed by communities to provide a service and those communities should have the means to ensure that they get the service they need and that its money is spent wisely. Public and police must communicate with each other and work in partnership, both to maintain trust between them and to ensure effective policing, because policing is not a task for the police alone.
47. The Patten report usefully categorises various aspects of accountability:
- **Democratic accountability** by which elected representatives of a community tell the police what sort of service they want from the police and hold the police to account for delivering it;
  - **Transparency** by which the community is kept informed and can ask questions about what the police are doing and why - otherwise described as **answerability**;
  - **Legal accountability** by which the police are held to account if they misuse their powers;
  - **Financial accountability** by which the police service is audited and held to account for its deliver of value for public money; and
  - **Internal accountability** by which officers are accountable within a police organization.
48. There are, of course, many other aspects of police accountability, these various aspects need to be borne in mind, whilst recognising that both individuals and communities will not necessarily envisage accountability in these various ways.
49. The Police Service of Northern Ireland (PSNI) has described itself as one of the most scrutinised police services in the world, not least because different bodies undertake different aspects of the above tasks. However, it could be argued that elsewhere in England and Wales, the local police authority fulfils most, if not all, of these roles.
50. From 1964 onwards, but with growing impetus from 1994, there has been an increase in the degree of central influence and control over policing, culminating in the Police and Justice Act 2006.
51. This has been accompanied by a framework which seeks to direct policing through a regime of national indicators, targets and centrally driven initiatives backed up by monitoring and inspection, and use of ring-fenced funding. As a consequence, the scope for authorities and forces to respond to the concerns of local people has been significantly reduced and thus local people see this as a lack of local accountability.
52. The APA recognises that central Government has a role to play in setting a broad strategic framework for policing. But there needs to be recognition that a truly



responsive local policing service means there must be scope to focus on issues which local communities say matter to them. If communities are to really feel that the police are responsive to them there now needs to be a fundamental shift away from central direction in favour of local flexibility.

53. This requires a fundamental change in the relationship between the Home Office and local police authorities. What is needed now is a more equitable, mature and trusting relationship between central government and local police authorities, so that authorities can get on with the job of finding sustainable local solutions.
54. There is also a need to look at policing accountability in the context of accountability of other local partners (individually and collectively), and ensure that processes are complementary and supportive rather than duplicative. Greater public accountability requires clear and transparent processes rather than the confused and mixed landscape discussed below.

### *Existing Accountability Arrangements*

55. Whilst the APA strongly supports effective partnership working, there is a cluttered landscape at local level with LCJBs, CDRPs, LSPs, Local Service Boards etc whose work has little visibility or transparency to the public who therefore have little opportunity to influence the work of those bodies.
56. There is also a need to understand the differing levels at which communities wish to exercise influence over policing. Police authority members are in constant touch with communities: their experience indicates that people are first and foremost interested in the safety of their own neighbourhoods.
57. To a lesser extent, there is an interest at the wider local level of their town, city or district – which could possibly be described as CDRP level or, in some cases, BCU level.
58. And indeed, communities are not just interested in the activities of the police – they expect to feel safe and/or be protected, regardless of whether the key agency for achieving those outcomes is the police; or other agencies such as local statutory partners eg the council or the wider Criminal Justice System.
59. People's interest in what goes on at the police authority/force level, as currently configured is more limited and extends mostly to around how decisions made at that level have an impact on local and neighbourhood policing. However, there is a need to recognise the impact on communities as a result of strategic force-wide, regional or national activity – for example, the impact on trust and confidence as a result of counter-terrorism activity or the use of police powers such as stop and search.
60. The APA would suggest that it might be helpful to look at the need, and if so how, to enhance and strengthen local involvement and accountability at these three levels ie neighbourhood; intermediate CDRP/BCU and Authority/Force level.

### *Communities of Interest*

61. However, crucially we also recognise that it is important to take account of the views of communities of interest as well as geographically defined communities and how to ensure their voice is heard. A vivid example would be how the views of Gypsies and Travellers and settled communities might differ about what they want the police to do in a given situation. There must be scope for all voices to be heard, not just those who shout loudest or organise in a particular way.

### Neighbourhood level

62. Even with the growing levels of confidence resulting from the roll out of neighbourhood policing, there is still an unmet appetite for local communities to own the agenda in terms of the direction of local policing and community safety. It is important to understand the nature of that appetite. Local people need to feel that they own the service that is provided rather than have it “done to them”.
63. So for example at **neighbourhood level**, communities want to know:
- What they can expect from both police and other local partners in terms of response and levels of service
  - what, in turn, is expected of them in support of that agenda
  - whether there is a local forum of some sort – not necessarily police led or driven - where they can engage with the police and other community safety partners to articulate and drive local priorities.
64. The APA would suggest that there is scope to look at a menu of options eg a neighbourhood compact or charter of some sort through which authorities and forces would spell out to communities their commitment.
65. This might include access to very local information covering say the above issues plus whatever other local information might be useful. We would not wish to see any central prescription imposed around this, nor would we expect this to be a bureaucratic exercise but a simple guarantee to communities about what as a minimum they can expect from the service.

### Intermediate level (*between neighbourhood and police authority*)

66. Consideration has previously been given at various times to what has been called an “accountability gap” between the neighbourhood and the level at which police authorities as strategic oversight bodies are in place.
67. Generally this has been called BCU/CDRP level - although it is important not to fall into the mistake of treating the two as synonymous: a BCU can encompass a number of CDRPs and vice versa. Indeed two police authorities have now removed the BCU structure altogether.
68. As previously indicated, however, there is a plethora of partnerships and bodies operating in this “intermediate zone” charged with various responsibilities for community safety and otherwise but which are themselves invisible to communities and provide a limited voice to engage with them.

69. Although the work finally emerging from the Crime and Disorder Review is heading in the right direction, the APA would suggest that there is scope for a more radical approach at this level and that the solutions could vary from area to area depending on what best works with local structures. What fits in two tier local government areas may not work in metropolitan districts or unitary areas for example.
70. The Review also presents an opportunity to look again at the proposals for Overview and Scrutiny Committees and Community Call for Action and the extent to which these mechanisms will add value to “accountability and involvement.” In this context, there may be a need to reconsider the relationship between local authority members and police authority members.
71. The differing roles of executive and non-executive functions in terms of performance management, decision-making and accountability needs to be clarified, for example CDRPs currently represent a combination of `officers` and `members`; LCJBs likewise are almost totally officer driven bodies with no local accountability other than through individual partners reporting back to their governing bodies.
72. One approach that might help to reduce the number of partnerships whilst increasing accountability and delivery would be to transform existing Crime & Disorder Partnerships from officer-led groups into stakeholder led Community Safety Boards consisting of locally elected representatives, Neighbourhood policing groups, the Business community, voluntary sector and so on.
73. The job of such Boards would be to consult and engage with the public in setting local Community safety plans & priorities which will be put into effect by a tasking & co-ordination group of the senior local professionals.
74. Such Boards could have a clear link to the electorate through the membership of councillor members nominated by the local authority.
75. Local Criminal Justice Boards could be responsive to the Community Safety Boards described above in order to ensure that LCJB and CDRP efforts are more closely aligned.

### **Police Authority/Force level**

76. The overwhelming majority of people in this country are suspicious of the “Americanisation” or party politicisation of policing and one of the most significant advantages of police authorities as currently constructed is that they have removed party politics from policing. This is important, given that whilst extremely rare, there are occasions when the police service has been called on to investigate issues such as postal vote fraud, cash for honours and other forms of political corruption.
77. Whatever legal safeguards are put in place to protect police officers from political interference in carrying out their duties, there is no denying that those with the power to appoint or dismiss chief officers and to determine the availability and allocate resources have potentially immense leverage.

78. So as a minimum, any governance framework needs to ensure that accountability bodies are constituted in a way that both represents the interests of the communities it serves but also prevents the dominance of a single agenda – party political or otherwise.
79. Police authorities, as currently constituted are still relatively young bodies - just 12 years old. Nevertheless, we believe that much progress has been made over a relatively short period both in engaging with local communities and in holding forces to account on their behalf.
80. Without being complacent, police authorities have worked well, particularly in taking party politics out of policing at local level.
81. And indeed police authorities are much more reflective of their communities in terms of diversity of makeup than for example local councils.
82. Indeed, we would suggest, that police authorities are more advanced in performance monitoring and scrutiny than many other local bodies and agencies. Uniquely, the work of police authorities extends across both community safety and criminal justice and through links with CDRPs and Local Criminal Justice Boards, police authorities can be instrumental locally in securing effective joined up performance management across the piece.
83. That is not to say that the current arrangements should be seen as sacrosanct, but it is important to build on the many achievements of the current system and get the right balance of accountability.
84. The APA strongly believes that there needs to be a strategic accountability and oversight body, equivalent to the current police authority, with clear statutory duties and powers to carry out the governance role. In our view, police authorities as currently composed secure the best form of local accountability at the strategic level.
85. The new explicit statutory provisions contained under the Police and Justice Act 2006, making chief officers explicitly accountable to police authorities for the management and performance of their forces, as is already the case in Northern Ireland, are welcome. But these are only just about to come into force and it is suggested that an opportunity be allowed for the impact of these changes to be worked through before decisions are made about the effectiveness of police authorities.
86. We consider that, in terms of democratic accountability, local councillors should continue to be in the majority of members on an authority. Elected members provide democratic accountability, including a major role in setting the police precept, as well as providing important links to other local government services such as Social Services, Education and Highways. However, we do consider that, as with independent members there is scope for councillor members to be subject to a competency-based selection approach, and believe this could be achieved, whilst also maintaining the need to secure political balance.
87. As evidence shows, the involvement of independent members has enabled authorities to secure a greater diversity of membership and skills and expertise that would not otherwise be available. Independent members provide an avenue by which any member

of the public can become a member and provide an opportunity to ensure that the authority has the right balance and mix of skills.

88. Authorities have worked strenuously to ensure that through the independent member appointments process, both the gender and ethnicity of authority membership more fully reflects the local communities it serves. Some 9% of all police authority members are now from BME backgrounds and just under half are women. Any changes which undermine that process would represent a reverse step.
89. Although we opposed the removal of magistrates as a category of membership, we are pleased that all authorities will have at least one magistrate member given the important links with the CJS and the growing relevance of this area to core policing business.
90. We would suggest that there should be scope for authorities to be able to slightly increase their size and capacity for example, if they identify needs for additional skills eg from probation services, social services or business and industry.
91. The APA remains strongly opposed to wholly or partly directly elected authorities. We can understand that this is seen as a simple way of increasing transparency and accountability. But in our view it is fraught with danger, including encouraging greater party politicisation of policing and a real risk of single issue or extremist groups targeting such elections and securing representation with very damaging effects both for policing and crucially on trust and confidence amongst Black and Minority Ethnic Communities.
92. We have very considerable concerns about the impact of options such as directly elected commissioners on the diversity of police authority membership. Candidates for elections will make promises, with the most extravagant likely to win today, but whilst chief officers retain direction and control, they will find it difficult to deliver, leading to greater public disillusionment.
93. As indicated above independent membership of authorities has brought significant benefits in this respect. There is a substantial body of evidence in this country and in Europe, that those who stand for election are predominantly white males and that both women and minority communities are reluctant to stand for election.
94. Under the current arrangements, all police authority members represent the interests of all the communities over the whole of the police area. And we would see it as a significant danger that directly elected members might see their role as simply to represent the constituency or interest group who elected them. It is important that a police authority is seen to be accountable to all members of its communities and not to any particular persuasion or grouping.

### **Profile of Police Authorities**

95. Police authorities are often criticized as ineffective because of their relatively low profile. Police authorities are often reluctant to invest money in raising their profile or in

publicising their work if this would detract from the resources available for delivering service outcomes to their communities.

96. Authorities are also conscious that communities want to see policing led primarily by professional police leaders. For example, research done for the Lyons report indicated that two thirds of the community wanted the key decisions in policing to be made by the police rather than by local politicians.
97. Schools might provide a comparison. Parents and the community want to see high profile leadership by the Head Teacher not the Chair of the Governors. But they also want to be satisfied that there is a body there whose job it is to make sure that the right head is appointed, that the Head is given the right support and is implementing a framework for the school set by the Governors as the voice of parents and the community.
98. The APA considers that there needs to be recognition of the right balance which should be struck. On the one hand police authorities recognise the need to do more to improve their visibility and transparency to local people, so that communities do know and understand how the police are held to account on their behalf. On the other authorities should not seek to be raising their profile simply for the sake of it.

*Giving people a greater say over local policing priorities.*

99. The APA is strongly committed to ensuring that local people have a strong voice in how they are policed.
100. There is already considerable consultation and engagement undertaken by police authorities and forces, as well as by others such as CDRPs and LCJBs, local authorities and others. Neighbourhood policing engagement has added a further grass roots dimension. A coordinated approach is essential to prevent `consultation fatigue` - police authorities could have a key role in ensuring this coordination.
101. Police authorities have developed many different forms of consultation to meet the needs of local communities including for example public meetings; websites; events in supermarkets; engaging with local youth parliaments and running sessions in fast food outlets etc. Authorities have already pioneered theoretical "participatory budgeting" for example in Surrey and Lancashire and last year South Wales Police Authority won an award from the CIPR Local Government Group for its consultation on police resources. Police authorities can provide many other examples of the innovative ways in which they engage with and seek communities' views on local policing.
102. So there is considerable good practice which already abounds and which can be built on in terms of community engagement. Likewise there are excellent examples of authorities and forces providing local people with access to very local data and information about the crime and other problems in their area (such as West Yorkshire Police Authority's *Beatcrime* website).
103. And whilst there are examples of partner agencies undertaking joint activities, it is a source of frustration for authorities who have statutory duties to engage with communities

- on local policing priorities other partners do not often seem to be as willing to see the benefits of undertaking more consultation and engagement on a joint basis.
104. When considering the voice of communities in public service delivery there is a need to consider the limitations and barriers of various methods. This relates to genuine representation of communities, as well as the nature of issues raised by communities, which will typically be localised, visible, social issues rather than the more strategic, less visible issues (examples include child abuse, domestic violence, internet crime, business crime, fraud). There will always be a need for a strategic body to understand the range of issues facing a local area and ensure a prioritised and balanced response is provided. Communicating the various challenges facing policing is a significant role for police authorities in terms of managing communities expectations.
  105. Equally communities need to see clear `pathways` in terms of action and the strategic decisions and accountability arrangements that support them.
  106. The APA looks forward to providing further input to this element of the review.

## Reducing Bureaucracy

107. The APA recognises that bureaucracy is generated by different elements and levels of the police service and we recognise there is scope for authorities to do more to challenge bureaucracy at the local level. However, there is no doubt that the Home Office generates a significant amount of unnecessary bureaucracy.
108. In addition, considerable bureaucratic demands are generated by other Government Departments, such as OCJR and CLG, as well as by regional government offices (GOs) without any conception of the burdens being imposed. This is a serious issue that should be tackled by the review.
109. Much bureaucracy is also generated by the criminal justice system. The APA fully supports the need to ensure that proper safeguards and protections are in place to protect the needs of both suspects and victims. But we believe there must be scope to find more effective ways of end to end working.
110. There are too many Government initiatives both major and minor, many of which are the result of the agendas of particular individuals, including within the service. The Government and the service itself should call a halt and stop the introduction of any new initiatives and programmes and enable the service to draw breath for 3- 5 years.
111. We recognise that there is a risk averse culture driven by media attention, political intervention, and multiple layers of scrutiny which has also encouraged the growth of bureaucracy.
112. It is important to recognise the skills and abilities of those in the service and move to an approach whereby people are given the confidence to exercise judgement and exercise the responsibilities they have.
113. At the ACPO/APA Conference in June, Gordon Brown commented: "We must do everything to give you the resources, especially the new technology you need to fight crime: technology to protect officers - including tazers; mobile data devices which cut down the need for officers to return to the station to fill out paperwork; and technology which does both - helps fight crime and reduce paperwork - like number plate recognition and head cameras".
114. The APA agrees totally with this sentiment, given duly identified business needs, and although therefore these types of technology should be invested in, they should not be seen as a universal panacea. The right investment, at the right time and in the right place will undoubtedly help reduce bureaucracy across its many layers. It is recognised that technology is not a panacea and that there is a need to ensure that IT proposals have the support of authorities.
115. There needs to be a dramatic reduction in the number of inspections and audits to which the service is subject- this consumes inordinate amounts of officer and staff time which could otherwise be devoted to delivering services.
116. There are good private sector examples of worldwide companies with little internal bureaucracy. Policing could learn lessons from elsewhere.



117. The APA is concerned by the calls already made for a reduction in equalities monitoring, be it employment monitoring, impact assessments or stop and search/stop and account. In fact the adverse impact in reducing or stopping these areas of work would be so great on community trust and confidence that one would hope it would not be considered. However, more thought should be given to reducing the bureaucratic impact on equalities work. For example, the use of electronic recording devices to assist in the monitoring of stop and search (currently being piloted in BTP).
118. De-centralise! There is still too far too much central prescription and micromanagement. As previously argued, in our view the Government doesn't need to have its hand on all the levers. Radically reduce the number of targets and Performance Indicators.
119. The establishment of the tripartite National Policing Board chaired by the Home Secretary able to set the big strategic picture provides an opportunity to start to do this. Everything else can and should be devolved to local level. Local people should decide what is right locally for policing and then let the service get on and do it.

## Making Effective Use of Resources

### People

120. The service's most important resource is, of course, its people. The real key to success in police reform lies with the people who deliver the service. We believe that this should be a key focus and that there is scope for more rapid and radical progress to be made on this front.
121. One of the key barriers to date, has been the absence of any agreed tripartite workforce strategy and flowing from that agreed tripartite strategies on areas such as leadership, pay and reward etc: to date, the approach has been piecemeal. This needs to change.
122. The APA is fully supportive of the workforce demonstration programme and will want to see this identify innovative ways of ensuring that we have the right people with the right skills in the right places. But this should not just be about productivity.
123. We also need to ensure that we value our staff by having in place proper workforce strategies
  - which recognise and reward appropriately
  - encourage the most talented people to join the service
  - promote diversity and equality of opportunity not just upwards but laterally across all specialisms, and
  - equip our people with the skills and training to fulfil their potential.
124. The APA wants to see a more flexible and responsive workforce, with greater opportunities for development for all staff in the police service. The APA has previously argued strongly for a more integrated workforce without artificial divisions. In doing so, however, it is crucial that a proper supporting infrastructure is put in place and appropriate investment made in training, development and career structure for police staff.
125. A more holistic approach is needed to workforce training and development to allow a greater level of transition between non-warranted and warranted staff. The Integrated Competency Framework and current developments in the training field provide the potential for this to happen.
126. There remain cultural and other issues militating against modernisation which now need to be urgently addressed, including:
  - the different legal status of police officers as against employees
  - single point of entry for police officers
  - the hierarchical rank structure
  - the expectation that officers will have a 30 year career in the service
  - police regulations and the cumbersome process for changing them
  - different sets of pay and conditions and different negotiating machineries.

127. Authorities need to have the freedom and capacity to decide the right mix of staff to develop a workforce which meets local communities' policing needs. We also want to see the development of common minimum standards for all those within the wider police family and believe that authorities have a key role to play here.
128. A major barrier to faster development of the integrated workforce has been the constant political focus on police officer numbers over a number of years and the perverse incentives which ultimately stemmed from the operation of the Crime Fighting Fund. The APA therefore welcomed Ministers acceptance of the APA's proposals to relax the CFF restrictions. What will be important is that if police officer number start to fall there is not a retrograde return to an unhealthy focus on numbers. The APA would urge that all those involved or with an interest in securing safer communities work collectively to help the public better understand that increased police visibility does not have to be delivered through an increase in police office numbers.
129. A unified workforce as advocated above should also help improve representation by enhancing opportunities for movement of both warranted and non-warranted staff. This would allow greater career choices for all and make the Service a more attractive and flexible working environment and facilitate recruitment from the wider workforce.
130. Shift patterns are a major issue. In some case these appear to be driven by factors other than organisational needs and barriers to a proper alignment of patterns need to be removed (these include current provisions in relations to variable shift arrangements and the technical capacity and capability of forces to design patterns that reflect demand). This applies to both officers and staff.
131. Moreover, issues such as shift patterns, overtime, Special Priority Payments etc also need to be addressed in terms of making the service more representative of communities, since these are areas which can impact particularly on female members of staff.
132. It is questionable whether the service is good at managing the balance of duty time and the time needed for proper workforce development such as training.
133. There is a need to review and build upon the current limited levers to enhance individual performance such as incentives and rewards, e.g. the Special Priority Payment scheme.
134. There is not enough sharing of good practice between forces, authorities, and between the police sector and other sectors. Not enough utilisation is made of websites (including the APA website but also that of other parts of the police service). Forces and authorities need to be prepared to share their experiences of what does and what does not work, and need greater exposure to useful information from other areas of the public and private sector.
135. The tripartite partners recently agreed to drop delivery of the Police Portal for want of an agreed business need. The APA can't help but feel that sight must not be lost of such a capability and that it be reintroduced at a suitable point in the near future when resources allow.

136. Pan-Government the introduction of joint working and delivery of joint outcomes may also require better alignment of shift/working patterns. For example, if the 101 Programme were to be reinitiated the release of any latent demand would have to be met by both the police and local authorities.
137. More generally there needs to be a greater preparedness to challenge current structures and thinking.

## Financial Resources

138. As previously indicated, the APA would refer the Review to the Joint APA/ACPO Publication "*Sustainable Policing*" which was intended to provide a contribution to the CSR07. This identified a potential funding gap during the CSR07 period of circa £1billion.
139. We also know that under its current CSR settlement the Home Office simply doesn't have the money to bridge that gap. "Sustainable policing puts forward proposals for key flexibilities and freedoms which would enable police authorities and forces to make more effective use of available resources.
140. The previous Home Secretary's letter of 11 June 2007 to Chairs and Chief Constables recognised the considerable achievements that the service has made in securing efficiencies and value for money to date. However, whilst authorities and forces will continue to seek to drive out efficiencies, it is important to recognise that efficiency savings cannot entirely bridge the funding gap.
141. There is a need to stop the constant flow of new initiatives, projects and programmes. A period of pause and consolidation is needed. This does not mean any lack of appetite to drive forward continuous improvements in policing but there is a need to allow the service to time to regroup and consolidate, as recommended by the Home Affairs Committee in its recent report.
142. The National Policing Board and the new Policing Portfolio Group need to quickly start to apply a rigorous approach to commissioning and indeed decommissioning of new programmes by all of the tripartite partners. There is a need to be able to make brave political decisions to stop doing things where this is appropriate.
143. Maintaining robust processes of local accountability and scrutiny – independent of forces, ie through Police Authorities, is key to driving performance improvements and greater efficiency and effectiveness.
144. Given continued stretched resources in terms of local policing, often one of the first areas of policing services to be cut back are those relating to diversity eg BCU Hate crime units or domestic violence units, or it could be corporate diversity units which are often seen as a luxury, resulting in forces often having minimal arrangements in place to meet statutory obligations and community needs. This results in adverse impact on minority groups, the vulnerable and those most in need.

145. In terms of identifying authorities and forces who are effectively tackling the challenges at present, the APA would suggest that the recent PURE assessments should provide a good starting point for consideration.
146. In terms of further levers and incentives, the APA considers that there is potentially much more scope for authorities to encourage greater effort by forces in relation to asset recovery but this is unlikely to happen unless authorities and forces are able to retain a greater proportion of recovered assets. The APA would argue that there is a need to revisit the current allocations between the various agencies (including the amounts retained by the Home Office) to increase the levels available to the police service. This is potentially a win/win situation since it would enable authorities and forces to invest further in this area and indeed this activity does not necessarily require the deployment of warranted officers.

***How can Joint procurement between forces be expanded to encourage greater VFM?***

147. It is disappointing that a decision was taken to unilaterally disband the Police Efficiency Procurement Service (PEPS). Whilst it may not have been perfect, some progress was being made.
148. Again, the service lacks a clear, agreed tripartite procurement strategy. This needs to be developed and put in place quickly, so that the NPIA can help drive this agenda forward.
149. National and regional collaboration on key issues such as procurement, systems developments, and accommodation ought to provide benefits. There should be scope to learn from local government and its greater experience in areas such as e-procurement. Are there things that could be learned from the successful private sector companies such as Tesco who maintain a house style right across the country and presumably apply standard procedures, IT systems and so on?

***To what extent should funding be tied to performance?***

150. The APA strongly supports allocation of funding based on need and would be opposed to any approach which resulted in communities not currently well-served by their forces being subject to further detriment as a result of any loss of access to funding that is otherwise being used to reward higher performing forces.
151. This issue can be viewed from either end of the telescope: if performance is good it would presumably be rewarded with additional funding; if performance is poor, it is not going to improve it by taking funding away. The problem may well be a lack of resources and inadequate funding. Good performance could be rewarded by, eg, reduced inspection, greater flexibilities. Poor performance needs attention targeted at specific weaknesses, which may require additional funding.

***Are there alternative mechanisms to the police precept which should be considered in respect of police funding?***

152. The APA considers that this issue is much more pertinent to the accountability strand. The ability to tax the local community is an essential element of local accountability.

Without it local police authorities would be little more than agents of central government. We note that the Lyons Review, considered these issues and made no recommendations to change police authorities' precepting powers.

153. The APA strongly supports local taxation continuing to contribute towards policing. It provides an important connection between the police and the communities they serve and reinforces local accountability. Police authorities make considerable efforts to consult communities and local businesses about precept levels and to keep them informed of the levels of service provided as a result of any increases. But the gearing effect on police authorities' budgets does nothing to help people understand how their money is spent, and can cause disillusionment
154. We believe it is essential that the public are able to see that the police service is accountable for the resources it raises through the precept and there may be ways of increasing visibility around how the police precept is collected without increasing the costs of collection.

**APA Secretariat**  
**August 2007**