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THE REVIEW OF POLICING – INTERIM REPORT

I thought I would drop you a short line with some very initial comments on the Interim Report published on 12 September.

2. From a Metropolitan policing perspective, we recognise the issues you raise and broadly welcome the direction set out in the Report, which was a thought-provoking read. We welcome the recognition of a number of areas in which the Metropolitan Police Service is piloting new ways of doing things – like virtual courts and the Directors Guidance Quick Process procedure for prosecution preparation. And some of the recommendations reflect quite long-standing ACPO positions. But you set out a number of challenges to Government and the police service itself which, we hope, both will consider carefully. The MPS and MPA will certainly reflect on your recommendations in terms of our policing responsibilities.

3. We welcome the thrust of the **reducing bureaucracy** section and would make the following comments at this stage:

4. We strongly support the call for national leadership in terms of reducing unnecessary bureaucracy; the need for the CPS to be included in a clear, joint endeavour; and agree that the NPIA has an important role to play in this area.

5. I think you surface an interesting debate about a risk averse culture in policing. Exercising professional judgement is, of course, integral to what the police service does. There is an important link to accountability here – which runs right down to the individual officer and the decisions he or she makes on an often daily basis. Some of this is about culture. But this culture, for me, is affected by and directly linked to an environment in which there are a plethora of bodies with a scrutiny/accountability role over policing activity. We can, as leaders of the police service, do our bit to foster a new culture. A joint compact between the tripartite players may help. But this must be supported by an appropriate overall accountability framework for policing, which I hope the Review will go on to consider in detail.

6. A statement of the obvious perhaps – but one which bears repeating – that the issues raised around stop and search/account need sensitive and thoughtful handling. We would welcome direct engagement with you on this.

7. In terms of mobile data, we are already engaged with the NPIA on a way forward. Just to say here that the MPS has extensive experience of using mobile data solutions through our use of over 2000 Mobile Data Terminals in our vehicles, and through a number of trials of handheld PDAs by officers. From this we have been able to identify those areas of activity where there have been significant improvements in officer productivity, and those areas where there is little or no increase in productivity. Equally we have also learnt that it is essential to use the right technology to deliver mobility to support the delivery of the information, and to support the increasing volume of information that will be delivered to, and generated from, mobile devices.

8. I would stress one issue related to bureaucracy which we would have liked to see given more prominence in the Report: the issue of recording crime (going wider than the issue of violent crime highlighted in the Report). We would reiterate the point made in our earlier submission to the Review that we are concerned at the disproportionate amount of time being spent by officers on the whole administration of crime and incident information. We continue to believe that the time is right for a fundamental look at the burdens imposed by as a result of the National Crime Recording Standard and National Standard for Incident Recording.

9. The points we would highlight on the **neighbourhood policing** section of the Report are those with a strong read-across to issues around resourcing and accountability. The need for strong, close partnership working is a given for us. But the Report raises some critical and complex issues around the alignment of Home Office and Communities and Local Government agendas; the impact of LAAs; and the impact of the neighbourhood management concept, pooling local budgets and participatory budgeting. We will want to look carefully at what this might mean in practice in a London context. The implications for how policing is organised, and who is held accountable for delivery, are fundamental.

10. On **managing resources**, we will submit a substantive response in the coming weeks which will include material on what we are already doing to up our game on productivity and efficiency. **In this context we strongly support the strategic importance of effective police leadership driving the productivity agenda, as highlighted in paragraphs 3.11 and 3.12 of the Report. But we remain seriously concerned that Activity Based Costing, in its current form, simply does not provide the right framework for holding operational leadership effectively to account. This is not only a bureaucracy issue. We need to move swiftly from the current position and we look to your Review to support the work we will be engaging with the Home Office, ACPO and others in developing a more actionable productivity framework over the next few months.** And from a London perspective though, I would just reiterate here our belief that in terms of resources, the capital is a special case. We would argue that the definition and funding of the national, international and capital city dimensions of the MPS's responsibilities require a serious re-examination.

11. On **accountability**, again, we would like to submit a substantive response in the coming weeks. In addition to the points made above, I would just reiterate our belief that it is difficult to disentangle accountability at a local or neighbourhood level from that which takes place at levels above that – including at the strategic force level. ‘Local’ accountability does not exist in a vacuum. I would urge the Review to look at the whole accountability framework since the links between the various ‘levels’ are crucial – though admittedly complex.

12. I know that you have already agreed to have some direct engagement during the autumn with the MPS Board and MPA representatives. We look forward to discussing the Review further with you then.

13. A copy of this goes to the Home Secretary, Tony McNulty, the Mayor, Ken Jones, Peter Neyroud and Len Duvall.

Ian Blair
Commissioner