

Policing Green Paper Consultation response form

Completed consultation response forms should be sent no later than Friday 10th October 2008 to the following address:

Electronic: policinggreenpaper@homeoffice.gsi.gov.uk

By post:

Policing Green Paper Consultation Responses
Police Reform Unit
6th Floor, Fry Building
2 Marsham Street
London, SW1P 4DF

Date	09/10/08
Name	Paul McKeever, Chairman
Organisation	The Police Federation of England & Wales
Contact Details (e.g. Postal Address/ e-mail/tel. number)	Federation House, Highbury Drive, Leatherhead, KT22 7UY. paul.mckeever@polfed.org

Empowering Citizens

Chapter 1:

Improving the connection between the public and the police

1. How can we best ensure that neighbourhood policing teams can hear from as many people locally as possible in shaping their plans?

- The focus of this question is on neighbourhood policing but we believe that a strong connection with the public is the thread that should run through all aspects of the police service whether that is NPT, CID or response. The paper itself acknowledges that response officers are 'probably the officers that most of us will come into contact with' yet the paper focuses almost entirely on neighbourhood policing.
- For too long now the centrally led performance culture has driven a wedge between police officers and the communities they wish to serve. Ticking boxes and chasing targets has led to a shift of focus away from the needs of the public and towards serving the needs of senior management and central government.
- We wish to see policing move away from a culture of 'what gets measured gets done' towards one where officers once again have the time to devote to activity beyond the station walls, time that allows them to engage with the public in a meaningful way. Experience tells us that officers patrolling the beat are far more likely to receive public feedback and gain intelligence than those waiting for it in police stations. This can then be supplemented by an intelligent approach to more formal methods of public consultation - increased opportunities for "surgery-style" interfaces, open at times when the public need them and in convenient locations (workplaces, supermarkets, pubs, libraries, post offices, schools).
- More thought needs to be given to how we define "community". Currently much emphasis is placed on geographic localities which can result in policing by postcode. Some communities are marked out by sexual orientation, race or religion but there may be others which are not so easily defined and, therefore, more difficult to engage with.
- There are also sections of society that are harder to liaise with than others (e.g. the young, the elderly, disabled people, people with literacy difficulties and those for whom English is not their first language). Thought needs to be given to the best methods of reaching these individuals in order to prevent a system where only those who shout the loudest get heard.
- All this takes time and resources and this needs to be acknowledged by forces. There are times when it can be difficult to justify a capable resource not being deployed to time critical incidents, particularly where police are measured by their response. This means that the important role of simply engaging with and reassuring the public is not catered for.
- There are a number of issues connected to Neighbourhood Policing which cause our members difficulty which need to be addressed. Firstly, 'workforce mix' which sees an increasing numbers of operational and public-facing policing skills being given up to civilian staff. Secondly, we have had feed back from many of our force representatives (in addition to evidence gleaned from our own research) that officers from NPT are frequently used to backfill emergency response teams. This is not only an indication of how dangerously under resourced response teams are but also defeats the object of neighbourhood policing. We are concerned about what will happen when the planned ring-fencing of NPT officers becomes mandatory. Finally, one specific aspect of neighbourhood policing which troubles our members is the publication of NPT photographs – this has long term implications for those officers who may wish to work on covert operations – this needs to be made more explicit.
- So far we remain unconvinced by the contribution that public access to crime maps will move towards the public consultation process. These maps are based on information provided by forces themselves so that they will already be alert to existing problems. Our fear is that they will provide a useful tool to criminals who want to know where police activity is most likely to be targeted as well as having a detrimental effect on house prices and home insurance.

2. What is the most effective means of encouraging customer service in the police?

The police service's customers are the general law-abiding public. However, people are also more individually customers of the police service – for example as victims, witnesses, or citizens. This experience of the police service shapes perceptions and feelings of safety and confidence. (Free response)

- Officers want to provide a high quality of service to the public but are frequently prevented from doing so. Operational resilience on the frontline response and CID teams is at crisis point. Overstretched officers more often than not are running from job-to-job, applying sticking plasters to crises. Improvements are desperately needed to help forces balance the competing demands placed upon them.
- The police service is a victim of its own success and the persistent “can do” attitude of its officers. More often than not the police are the first port of call for a range of issues that would usually fall within the remit of the social services.
- What will contribute greatly towards achieving this goal is to clearly define the role of a police officer and what they can realistically be expected to achieve. They must then be given the resources they need to fulfil that role to the best of their ability – including adequate training, supervision, technology, administrative support, work/life balance and fair financial reward.
- This can then form the basis of re-negotiated partnerships with other organisations – more successful working relationships based on a more formal level of understanding such as Service Level Agreements or Memorandums of Understanding.
- It is now time for performance monitoring to focus on quality rather than quantity and redefine what is meant by a ‘poor performing’ force. It is no longer acceptable to earmark a force as failing simply because it does not tick all the boxes – further acknowledgement needs to be given to the majority of police time which is spent on valuable activities such as public reassurance, crime prevention and supporting victims which does not currently fit into any target category but contributes greatly to the provision of a quality service. Removing the pressure on officers to achieve numerical targets will also help ensure that officers can focus on those matters which are causing the community greatest concern.

3. Given the core role of PCSOs – which is one of high visibility patrol, community engagement and problem solving - do PCSOs have the right powers to enable them to do their job? *The current powers available to a PCSO can be found on page 18 of the main document. (Free response)*

- Whilst we acknowledge that PCSOs have the potential to make a useful contribution to the service as additional “eyes and ears”, we maintain our view that they cannot match the flexibility, utility and reassurance of an experienced, fully-sworn and omnicompetant “bobby on the beat”.
- We welcome any measures which end the confusion that currently exists over what PCSOs can and can't do. More action needs to be taken to inform the public so that they are clear about the function and purpose of PCSOs and what their current limitations are.
- The standardisation of PCSO powers is important but we request further clarification as to how the standard and discretionary powers bestowed by Chief Officers across the country will be monitored and kept in check.
- It is our view that PCSOs have sufficient statutory powers and that there should certainly be no extension of powers which could lead PCSOs into confrontational situations for reasons of their own safety and that of the public. It would also begin to undermine one of the core principles behind their introduction to “undertake public facing non-confrontational duties in uniform”. We also strongly recommend that as soon as ‘reasonable force’ comes into play in a situation then that is a step too far for a PCSO and it should then become the responsibility of a police officer – someone with the skills and experience to handle the situation proficiently.

- A PCSO is not the same as a police officer and the public cannot expect the same level of service from them. It is therefore vital that PCSO uniforms are clearly and quickly distinguishable from those of police officers. Anything other than that has the potential to mislead the public and compromise the position of PCSOs.

4. How can we ensure that police authorities and local authorities everywhere cooperate in tackling local people's priorities – including ensuring that the local pledge is delivered everywhere?

The police are not solely responsible for crime and disorder reduction; it is important that they work alongside their partners such as the police authority, fire and rescue services, the local council and health trusts. It is important that they cooperate in order to make communities safe. (Free response)

- Forces already have functioning channels for public consultation which help them to establish what the local priorities are. Frequently these priorities are beyond the remit of the police service. But it is often the case – particularly out of office hours and at weekends – that other local service providers and partnerships do not have the resources available to tackle those priorities and it is left to the police service to do what they can. Social service providers need to be given the resources so that they can respond in a timely fashion around the clock, seven days a week.
- More action needs to be taken by local authorities to ensure that the partnership structures that are already in place (such as Joint Operations Groups for example) are operating effectively. Often the efficiency of these groups is held back by the lack of authority of attendees to put into action the suggested solutions to problems that have been identified.

5. What is the right balance between local council representation and independent members?

Under these proposals police authorities will have a majority of directly elected members, complemented by representation from local councils and independent members. (Free response)

- We are unconvinced that directly elected members would ensure greater representativeness of the local communities that a police authority is there to serve.
- Police officers pride themselves on political independence – the notion that police authorities would be open to greater political influence (particularly if elected members are in the majority) contradicts this basic principle.
- How would the representativeness of candidates be measured? What measures could be taken to prevent the proposed elected positions being targeted by a highly organised local group with a particular agenda. Should such a group be successful, it could lead to extreme policy difficulties for the Police Authority and/or the local council, which would then clearly impact on the Chief Officers and subsequently our members and the general public.
- In practice - given their experience and knowledge of local elections – it seems likely that the majority of such positions might be filled by local councillors. What then will be the gain to the present system?
- There are cost implications of the elective process which are not dealt with by the green paper in any way. Where will the funding come from? Will this require cutting back of other areas of policing?

6. To what extent might police authorities be able to allocate part of their budgets by participatory budgeting?

Participatory budgeting is when ordinary citizens are able to decide how to allocate elements of a budget. (Free response)

- We can see little benefit to be gained from the introduction of participatory budgeting. Such mechanisms will necessitate additional administration, auditing procedures and associated costs thus adding to the burden of bureaucracy.
- We are also concerned that it could place police officers in an invidious position for, potentially, it offers local interest groups the opportunity to deploy police officers to pursue highly partial and/or political purposes.
- There is no clarity as to how the funding would operate. We would not wish to see the top-slicing of money from police budgets to create a Community Safety Fund. This would create the potential to divert funds to neighbourhood policing at the expense of force-wide or regional policing matters that are often invisible to the community.

7. What other community safety budgets do you think might be suitable to be allocated in this way? *(Free response)*

The Police Federation has no comment to make

8. Do you consider the creation of the Communities Safety Fund to be the best way to use the money that currently makes up the BCU fund?

The BCU Fund is currently used at Basic Command Unit level to help deliver crime and disorder reduction locally and promote partnership working. The Community Safety Fund will be available to Crime and Policing Representatives to allow them to address locally identified priorities. (Free response)

The Police Federation has no comment to make

9. How might the Councillor Calls for Action be best used to complement the broader changes to local accountability arrangements for policing?

Councillor Calls for Action is a new power enabling local people to raise issues of concern on local Government and Crime and Disorder matters. The Councillor Calls for Action would allow councillors to raise local concerns with the relevant member of the local CDRP. In extreme cases it would allow the local councillor to refer a concern to the relevant overview and scrutiny committee for further action. (Free response)

- Calls for action could provide a very useful means of receiving messages from groups and individuals who may not ordinarily engage with the police. They could therefore help identify and respond to critical short-term policing needs which may either have not been identified, or have been identified but not dealt with effectively.
- It would be useful for links to be made, at a local level with councillors contacting neighbourhood teams – rather than feeding in calls to the police at force level. These calls could then be used to help build long-term consistent objectives.

Professionalising and freeing up the police

Chapter 2:

Reducing bureaucracy and developing technology

1. How can we best involve frontline officers and staff in designing more effective and less bureaucratic processes?

We ask a lot of the police and so it is critical that they are able to focus on meeting those priorities in the most efficient way possible. We believe that frontline officers are best placed to identify what is effective and what is not. We propose that we create a bureaucracy champion who will convene a frontline practitioners group to test proposals of the police service, Government and CJS for impact on the frontline. (Free response)

- In our view there is nothing intrinsically undesirable about 'bureaucracy'. Such processes are essential to protecting all citizens and officers to ensure an adequate and effective body of information upon which to take decisions and regulate institutions. The problem lies in the collection of unnecessary, irrelevant or duplicated information.
- For processes to become less bureaucratic it is vital that frontline staff are involved in the consultation process when it comes to getting rid of unnecessary forms or streamlining processes. However, for consultation to be effective, management and senior officers need to take seriously and act upon the administrative problems that are highlighted by officers that prevent them from carrying out their duties effectively. Anonymous feedback methods may assist in gleaning open and honest opinions from officers.
- Nationally approved forms to replace local forms.
- Single-entry data systems, especially in file preparation and custody systems.
- Common policies on statement taking (some forces still insist on taking statements for all crime reports in addition to the crime report)
- Joined-up thinking about agreed file standards
- Joint CPS/CJU/Police targets – joint agreements on what should be included in files. This would need to be communicated to officers who complete files and make clear what the expectation is.

- The proposed reduction in the number and range of performance indicators should facilitate an increase in discretion. However, we are concerned that the present constraints (from performance indicators) might merely be replaced by well-meaning but ill-informed priorities defined by the new Crime and Policing Representatives (CPRs).
- We welcome the roll-out of mobile IT devices and hope that more will be done to encourage the use of hand-held devices by frontline officers. However, this investment should not neglect the administrative functions that officers are required to perform within the station walls. File preparation remains a major part of an officer's workload and it is vital that there is further investment so that each officer has ready access to the technology that is required.
- The abandonment of Activity Based Costing ought to help reduce bureaucracy. However, much will depend on the replacement regime and whether or not this permits forces to reduce the amount of detailed information required.
- We strongly advocate creating a simplified PDR system that conforms to national standards and is quick and easy to complete without being bureaucratically burdensome. This is important not least for the roll-out of Work Based Assessment.

2. How can we ensure that new forms of bureaucracy do not replace those that we are committed to reducing? *(Free response)*

- It is often the case that force policies are amended at a local OCU/BCU level which in turn can lead to an increase in bureaucracy. It is important that local processes are monitored to make sure that they do not add to the bureaucratic burden of nationally standardised processes
- Ultimately returning discretion to officers and reducing the number of performance indicators will significantly reduce bureaucracy and prevent other forms being introduced.

3. How best, together, can we tackle the risk aversion that Sir Ronnie Flanagan identified? *In his Report, Sir Ronnie Flanagan identified a number of areas that together had helped to create the bureaucracy that now surrounds the police. Sir Ronnie identified that the majority of these reasons stemmed from risk aversion. (Free response)*

- Measures should be introduced to make sure that there is proper delegation of decision making in order to break a habit of pushing decisions up the rank structure. The 'blame culture' that has become so prevalent in the service needs to be addressed and tackled in order to eradicate risk aversion.
- Ensure that all officers are fully aware of the decisions they are able to make and have the skills, experience, confidence and backing from their senior managers in order to execute those decisions effectively.
- Ensure leadership training (not just management training) is delivered effectively.
- It is important that forces learn from mistakes and create a culture whereby decisions made in good faith but ultimately flawed are dealt with in accordance with the new regulations on misconduct and performance. This will mean managers will need to understand the shift towards developing a learning environment, rather than feeding a blame culture.
- Police officers are less inclined to take chances with their careers in a climate where there is little belief that a court of law or discipline hearing will back them for the decisions that they took in good faith. Chief constables have sought to reduce the risk adverse nature by attempting to negate health and safety legislation accountability but this is not a satisfactory answer.
- A radically revised system of performance measurement may help to stimulate change.

However, we have reservations about how the proposed changes to the performance measures outlined in the Green Paper will be implemented in reality by senior managers in force.

- Health and safety law already encompasses a proportionate approach to risk - that is what "reasonably practicable" means, and it allows the special nature of policing to be taken into account. The law does not aim to neutralise all potential hazards. Unfortunately ACPO seems determined to ignore this fact and wishes to press ahead with its own agenda for heavy-handed change in health and safety law.

Chapter 3: Defining roles and leadership in the police service

The NPIA will consult on how we can ensure that constables gain a wide professional understanding of their force's work through their initial training and deployment, and their subsequent development, balancing this requirement practically with the need to provide constables with the specialist skills to enable them to deliver professionally in the complex environment of 21st Century policing. The NPIA will also consult on how best to ensure that all new Police Constables are trained in providing the best possible quality of service to the public.

- 1) How can we best change the operation of Senior Appointments Panel to make it more proactive in succession planning and appointments, with greater strategic input into leadership development?

Currently the Senior Appointments Panel spends most of its time discussing individual chief officer applications to posts as they arise. We are proposing that in future, the SAP spends relatively more time on the strategy for the management of the overall pool of top police talent. (Free response)

- It is regrettable that there are no questions in this consultation which relate directly to leadership training in ranks other than chief officer. The Home Office, APA and ACPO have agreed a leadership strategy for the police service which, on paper, applies to all police officers and staff with management responsibilities. In reality (from what we have seen to date) its approach and focus appears to be aimed solely at the training and development of senior police officers to the serious detriment of constables through to the inspecting ranks.
- Leadership in the police service applies across all ranks from constable to chief officer. The only way to ensure that there is an appropriate pool of top police talent is to have the correct learning and development so that officers who wish to move through the ranks have the appropriate development opportunities with a modern, structured and supportive career enhancing framework to help them achieve this.
- There is much talk of the benefits of what the Senior Leadership Development Programme (SLDP) can do for senior officers but no mention at all of the Core Leadership Development Programme (CLDP) for the federated ranks.
- It is vital for the good of the service and confidence of serving officers, that proper, robust accountability procedures are in place that ensure officer development training at all ranks remains a priority for the people management strategy. There have been significant departures from acceptable practice and meaningful quality assurance in recent years and the Home Office must take responsibility to address these concerns to prevent further erosion of skills and operational capacity.
- Hence we are disappointed that under this heading the question simply considers the appointment of senior officers. The needs of the service are much greater than a focus wholly on senior officer appointments.

2) How should a scrutiny gateway for the renewal of fixed term appointments work? (Free response)

The Police Federation has no comment to make

3) What is needed to recognise that it can be right for chief officers to leave a force before the expiration of their contract because that is best way forward for the individual or for the organisation?

Sometimes it can be right for an individual to leave before the end of their fixed term appointment not necessarily due to poor performance but because it is best for the individual or organisation. (Free response)

- If a chief officer is to be appointed, one of the values he/she must have is the ability to recognise where he/she is not doing well and the integrity to highlight faults and failures. He/she should have the facility to call on assistance from other chief officers can share knowledge and experience in those particular areas before circumstances reach the stage where a 'sideways move' is necessary.

4) How can we establish better succession mechanisms, including in poor performing forces?

Currently candidates apply for chief officer roles as and when they are advertised and there is little/no succession planning. (Free response)

The Police Federation has no comment to make

- 5) The government would also appreciate views on the proposed approach to Regulation 11's provisions on serving in another force as chief officer before becoming a chief constable.

Legislation demands that a chief officer must have served at least 2 years at chief officer rank in another force if they wish to become a chief constable. Regulation 11 allows for this to be waived in exceptional circumstances. (Free response)

- In our view Reg 11 has to stay. We should continue to appoint the chief constable from an outside force – such a practice negates the possibilities of nepotism and helps ensure that chief officers can inject fresh ideas into a force. At the same time, the Government could make it incumbent on forces to treat all ACC-level officers as potential Chief Constables and to provide them with the opportunity to be trained for such office. In effect, we could have the dual benefits of a national succession plan and 'new blood' appointments as chief officers.

Chapter 4: Focusing on development and deployment

1. The Government would be grateful for initial views on its outline three-year equality, diversity and human rights strategy for the police service.

We are proposing to set minimum equality standards for policing, support and work with statutory staff associations and diversity staff support groups and to explore the possibility of widening the interpretation of the Genuine Occupational Requirement to increase representation of under represented groups in the police service and higher ranks of the organisation. (Free response)

- We uphold the tenet that a police officer should be able to serve all members of the public equally and fairly, whatever their age, gender, religion, culture, sexual orientation, or origin.
- As a staff association, we are aware of the wide diversity of our membership, comprising of officers from a wide range of national and ethnic origins, religion and belief, sexual orientation, age and gender. The service is presently at its most diverse; however we acknowledge that there are still considerable opportunities to increase this diversity even further.
- Equally, we are aware of the sensitivities around diversity and that a lack of knowledge, confidence and awareness can limit the ability of police leaders to effectively manage diversity issues. We believe that it is this sensitivity that underlies the quest for a GOR to 'validate' decisions that they should otherwise have the confidence to take. What the police service needs instead of a GOR is enhanced training and guidance for police leaders to make diversity-related decisions with the confidence that they are complying with the law.
- The introduction of a GOR in policing has the potential to result in specialisation in its most inefficient and divisive form with officers being trained in particular areas, leading ultimately to a loss of general skills. Forces would then run the risk of undermining resilience within the force. If GORs are to be applied to roles within officer ranks or specialist posts then we would want these to be explicit.
- We maintain that officers should be recruited on merit and do not support policies of positive discrimination which can potentially lead to putting people into the wrong job or the wrong at the wrong time for the wrong reasons, driven by the need to fulfil a real or perceived quota. However, we believe that positive action should be taken to encourage more BME candidates to apply to join the service and to encourage those who are successful applicants to progress through the ranks.

- We would welcome a holistic police service strategy with common aims and objectives which encompass the recruitment, retention and progression of BME officers. The consultation process for this strategy should involve HMIC, NPIA, Home Office, APA and ACPO alongside CPOSA, the Superintendent's Association, PFEW, staff support associations and trade unions. As a result, forces should be guided and encouraged to develop best practice on positive action.
- The role of HMIC is fundamental in ensuring that the joint strategy is being adopted by forces, that forces equality schemes are "fit for purpose" and that outcomes are being achieved. They should also be monitoring the review process and success of individual schemes.
- Whilst PFEW is not opposed to single equality schemes, we do want to ensure that the schemes cover all strands of diversity in an appropriate manner. HMIC will have an important role to play in assessing schemes and matching objectives against outcomes.
- The equality strategy should highlight the importance of Diversity (or Equality) Impact Assessments. In terms of policy setting they are an important measure in a similar vein to Risk Assessments. Our desire would be for forces to carry out DIA as a matter of routine, *visa vis* risk assessment.
- We cautiously welcome more emphasis on local accountability. The intention that police authorities and forces will no longer be held centrally accountable to the dictates of individual efficiency and productivity targets that are currently alienating large sections of the community should deliver accountable benefits. However, we question whether HMIC (in conjunction with the Audit Commission) as it currently stands has the resources and capacity to carry out meaningful inspections on the capability of police authorities' and forces to secure the best value for money, especially at a time when Sir Ronnie Flanagan has announced a contraction of HMIC posts.

2. The Government would be grateful for views on what impact (positive, negative or none) will the Green Paper proposals have on communities, police officers and staff from diverse backgrounds. This will inform further development of the Equality Impact Assessment for the Green Paper. *(Free response)*

- Whilst we welcome the recognition that the office of constable is the bedrock of policing there is little in this paper that suggests that this is anything but lip service in an attempt to appease officers whose morale is at an all time low. It is what the Green Paper does **not** contain that is very troubling.
- There is no acknowledgement of the crisis in resilience of response and CID officers and no concrete suggestions on how this crisis will be resolved
- Scant mention has been made of the rank of Inspector. Greater clarity of the role of officers in that rank is needed. They also need greater support, training and development that is specific to their rank - particularly those new to the role or applying to be inspectors.
- The dilapidated state of training for the federated ranks is glossed over – including the very important area of probationer training.
- The declaration that the government will instigate a Pay Review Body if the police staff associations do not accept a multi-year pay deal is regrettable and couched in language that smacks of bullying and ignores the ongoing negotiations taking place through the PNB.
- We are concerned about the workforce mix elements contained in the paper. The implication

is that police numbers will be reduced with 'operational staff' as opposed to police officers providing front line policing.

- With regard to the workforce modernisation program, we are concerned that all pilot projects are declared a success no matter what the outcome. We call for a full, independently led assessment of the positive and negative aspects of pilot projects before they are considered for national roll-out.
- The move towards delegating tasks (positions & duties) away from officers towards staff may have the effect of making officers more remote from the community with unintended consequences. For example, the presence of beat officers in control rooms/call centres provides an invaluable local knowledge which police staff may not be able to acquire.
- We welcome the acknowledgement that sergeants are 'the linchpin of the police service', that they have clear training needs and that effective support for the sergeant role also requires the development of national standards, accreditation and the promotion process. However, we are very concerned that there are no consultation questions about these issues and that the Green Paper does not suggest any specific proposals to address these issues other than the government 'expects' forces to act on them under the threat of another HMIC inspection in 2010. Any action to remedy the existing training deficiencies (of all ranks) will require additional funding. There are no proposals for increased funding in the Green Paper. We seek absolute assurances from the government that there will be full consultation with the PFEW prior to any changes in employment status which have an impact on officers' pension entitlement.
- The proposals for a three- year equality, diversity and human rights strategy outlined in the Green Paper hold the promise of further embedding diversity within and across the Police Service. However, care needs to be exercised to ensure that this process does not develop (or degenerate) into a top-down, 'tick-box' exercise.
- It is evident that the introduction of PCSOs has widened diversity within the service. However, it is our view that this should not be at the expense of increasing the numbers of fully trained officers; a similar recruitment drive for police officers at the neighbourhood level should be able to attract applicants from a similarly diverse background. Care is needed to ensure that diversity does not become the preserve solely of PCSOs.
- The increased specialisation of PCSOs in neighbourhood policing may reduce the contact officers have with their communities and may reduce trust and confidence in police officers. We run the risk of limiting the contact officers have with their community to only that of confrontation, coercion and confinement.
- Whilst we broadly welcome the increasing interest in members of the community wishing to serve as special constables, we are concerned that the planned 43 per cent increase appears to present the impression that a corps of volunteers is a substitute to the roles performed by our colleagues who have committed themselves 'full-time' to a life of policing, without whom there would be no police service as we know it. The reality is that special constables are not under obligation to perform tour of duty and their availability can never be taken for granted.
- We welcome the new approach to targets but we cautiously wait to see how quickly the system will change and hope that the new system of locally driven targets does not see a continuation of the 'what gets measured gets done' approach to policing.

Strategic role for Government

Chapter 5: Co-ordinating change in policing

1. Are our proposals for strengthening the National Policing Board and encouraging collective action on the small number of issues that demand national attention right?

The National Policing Board is made up of representatives from NPIA, ACPO, APA, SOCA, HMIC and the Home Office. The NPB is the main forum for discussions on policing, allowing structured discussions on key strategic issues, and providing governance to joint work conducted at lower levels. In order for its support to be well-targeted, a new approach to decision-making is needed based on an agreed set of principles. We propose that these principles form the 'rules for engagement' which help determine when it is right for decisions to be taken nationally, encouraged regionally, or devolved locally. (Free response)

- The issues that are clearly best dealt with regionally or nationally are those of protective services, counter-terrorism, certain aspects of roads policing and some serious and organised crime. The development of the National Policing Board would be welcomed as a forum to ensure that collaborative arrangements are effective. There seems to be a glaring omission of the Police Federation in the National Policing Board.

2. Using the principles we have outlined, what issues should be decided at the national, regional and local level, and who should have responsibility for taking those decisions?

*The principles outlined in the Green Paper are the importance of whether **operational benefit** and **cost-effectiveness** are maximised at that level. The decision-making level should be **proportionate** to the scale to the problem, and enable **risk** to be managed effectively. Those responsible for a decision should have the right **skills and resources** to deliver and to innovate, and should be **accountable** for their decisions. There should also have sufficient **resilience and flexibility** to meet changing demands and to ensure a **consistent** and high-quality approach is in place. (Free response)*

- The issue of decision making at a regional level is possibly the most sensitive one. A large force in a regional arrangement might expect to have a greater say in the decision making process. Smaller forces may feel excluded from the decision making process. Measures need to be taken to ensure a greater balance of influence. There may be an argument for a central or locally appointed arbiter to assist, but this would only serve to increase bureaucracy and lengthen decision making times. Other means, such as rotating the role of chair, may be more beneficial.

3. In what areas of policing should we give greater freedoms to frontline practitioners to enable them to deliver on local priorities and on seriousness in the most effective and efficient way? (Free response)

Police forces are currently piloting a scheme which allows officers discretion over making arrests rather than focusing on achieving set targets.

- Consideration should be given to the following (particularly for the inspector ranks): Charging decisions; extensions to detention; work-based assessment applications; Section 60 stop and search authorities; more decision-making around the new misconduct/UPP procedures; greater decision-making for neighbourhood inspectors' regarding crime recording and writing-off crimes if appropriate.

Chapter 6:

Reinforcing collaboration between forces

1. What more can be done to build upon present policing arrangements to improve the security of our borders?

Currently there three main policing functions at ports, who work alongside the UKBA; Special Branch is responsible for national security and counter terrorism matters, Protective Security provide policing to secure the port infrastructure and General Policing deal with crime and disorder. (Free response)

- We recommend a model based on geographical forces which have responsibility for ports and airports in their own force area. Funding for such forces should be allocated centrally and officers deployed with the understanding that they should not be used for alternative duties.
- Partner agencies should be encouraged to share intelligence by bringing together intelligence sources (police, HMRC and Immigration). This would streamline processes and allow analysis across the three main agencies leading to economies of staffing and opening the way to 24/7 intelligence units in larger airports and ports.
- The targets that each agency works towards often conflict. For example, Gatwick airport security department has a target based on arrivals and ensuring passengers are moved through within certain time limits. The Immigration Service has a different target based on scanning all passports to read the chip that contains the biometric data. This has led to a slowdown in processing all arrivals, as their target is to scan ALL incoming passengers. This conflicts with, and frequently impacts on, the airport security target.
- Examples of good practice should be disseminated to all partner agencies (e.g. one useful process that does work at Gatwick is the MATRA (Multi-agency Threat and Risk Assessment) meeting structure which brings together all of the agencies working at the airport. MATRA delivers against risks and not business area targets. In the immediate aftermath of the Glasgow terrorist incident, a number of emergency MATRA meetings were held and were able to put into place security measures which meant minimum disruption to the business of the airport.
- “e-Borders” is a good idea but needs the appropriate resources to make it work. If e-Borders is linked to a PNC check, a desirable part of the process, then points of entry and exit will require investment in police and HMRC numbers as well as significant investment in custody and transport facilities. If this is not in place policing at the points of entry could be seriously hampered by lack of resources, leading to a reliance on the host force officers to deal with wanted people. It may mean a higher level of vetting for some agencies to bring them up to the level of police officers. Only police officers have the flexibility to be deployed to other locations or duties quickly and efficiently. By having police officers drawn from the host force the relationship with the force will mean that, in times of emergency, the policing operation is seamless and can be sized up to match demand. We would also like to see e-Borders developed into a crime investigation platform that disrupts criminal activity and behaviour at all levels.

2. If a border policing agency were created, how far should links with local forces and local accountability be preserved?

Any border policing agency independent of local forces would require a police authority-like structure to scrutinise its activities. We have proposed that locally elected Crime and Policing Representatives should make up a significant proportion of a police authority. (Free response)

- Confusion already reigns over who is responsible for what creating a gap in policing which is too small to attract the attention of SOCA but too large for a single force to deal with.
- More work needs to be done in order to encourage chief constables to share resources in order to make regional collaboration a greater success.

3. What are the operational benefits and risks of creating a national police border force as proposed by ACPO?

ACPO propose creating a separate national police border force in England and Wales that would focus on all aspects of security and law enforcement at the borders, under its own chief constable. (Free response)

Benefits:

- A single structure and application of strategy;
- Clear goals and objectives – nationally;
- No conflicting targets;
- Less drain on force resources;
- The new force can focus entirely on its core business;

Risks:

- Flexibility – how to respond to incidents and threats that require speedy deployment of additional resources;
- Will still be a reliance on the host force at each site – as is currently the case with BTP;
- Set-up costs will be significant – recruitment, legislation needed, how to recruit senior management (as well as Sergeants, Inspectors and Chief Inspectors), infrastructure will need to be built or purchased – buildings, IT, vehicles, custody arrangements etc;
- Possible threat to existing force budgets nationally (where would additional money come from?);
- Who would deal with “inland pursuit”?

4. Are there any variations to ACPO's national policing model that could offer greater operational benefits than those currently being delivered under the present arrangements? *(Free response)*

The Police Federation has no comment to make

5. What would be the main costs?

Proposals for changing present structures would need to be both affordable and cost effective. (Free response)

- Recruitment/selection/training/setting of regulations/provision of pension schemes – for both Police officers and staff
- Attracting higher ranks from other forces – might be expensive
- Accommodation – custody facilities will be needed
- IT provision
- Vehicles
- Regulatory changes
- Specialist officers – e.g. firearms (would all officers be firearms trained)

6. Will structural reform be required?

The scope and timing of changes to police structures may be dependant upon new legislation. Some would require constitutional changes to the police service, others just changes to working practices. (Free response)

The Police Federation has no comment to make

Respondent information

How did you find out about the consultation?

- a) from the Home Office
- b) on line
- c) Through our organisation
- d) through friends
- e) through an event
- f) through the media
- g) other (please specify)

x

How are you replying to us?

- a) by e-mail
- b) by post
- c) at an event
- d) other (please specify)

x

Please indicate the region of the UK you are from, or the organisation that you represent is based:

- a) England
- b) Scotland
- c) Wales
- d) Northern Ireland

x
x

Are you a: (please tick all that apply)

- a) member of the general public
- b) member of the police force
- c) member of a police body (eg police authority / ACPO / APA)
- d) local government
- e) central government
- f) other (please specify) STAFF ASSOCIATION

x