

## Foreword

*The police service of this country is used to dealing with crisis; it is what we do. Normally they are of the operational kind so well illustrated by recent events in Cumbria and Northumbria. However, the current challenge is one that is shared by the whole public sector. In short, we are all facing the most severe cuts to funding in living memory.*

*So we have a fiscal crisis to deal with. The same principles of policing will apply. We are charged with keeping people safe. It is incumbent on us to do all in our power to ensure that (however severe the final settlement is), we preserve at all costs the front line of the Service. I am confident that I speak for all Chiefs when I say that this mission is clearly understood. We also know that we will have to deliver with fewer people, that is simply a harsh fact for an organisation that spends over 80% of its budget on people.*

*There will have to be radical changes to how we operate, with reorganisation at the centre, (including ACPO) and, if we are to maximise the savings without compromising service delivery, reform at the local end of the business too.*

*New accountability mechanisms should bring greater freedom and flexibility to chief constables but must be fully thought through to ensure that all policing disciplines - local, national and international - are included and that operational independence is preserved at all costs.*

*ACPO is committed to working closely with government to ensure that the decisions they finally make are fully informed by the voice of the profession.*



**Sir Hugh Orde**

ACPO President

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# Chapter 1: Introductory remarks

## 1.1 INTRODUCTION

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- 1.1.1 This document has been prepared around six work strands to meet the initial pre-consultation time scales.
- 1.1.2 It starts from the basis of understanding the 'deal' that, through democratic accountability, will deliver greater freedom at the local level with some remodelling of the national landscape.
- 1.1.3 For the first time since the dialogue with the new government began, financial modelling is added to this reform package. This raises a scenario that is still achievable but places many parts of the police service under severe strain.
- 1.1.4 Much of the report is concerned with understanding the reality of budget cuts and seeking necessary flexibilities in fast time. If we are to succeed in our aim of protecting delivery whilst meeting budgetary targets, government and the police service must be radical even if it means challenging previously held positions.
- 1.1.5 A significant amount of evidence sits behind this strategic report. We are ready to provide additional information and engage in further dialogue over the coming weeks and months.

## 1.2 METHODOLOGY

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- 1.2.1 Prior to the meeting on the 21 June 2010 with the Home Secretary and Policing Minister, discussions had already taken place between the President, Vice Presidents, a small group of chief constables and the Ministerial Team within the Home Office. It was clear that the new Coalition Government was keen to move fast to develop a programme of police reform that would be required to ensure that policing in the 21<sup>st</sup> century could address the operational and financial challenges it now faced.
- 1.2.2 On the 21 June 2010, all chief constables were informed of the strategic challenges facing not only policing but the country as a whole; the budget deficit being foremost amongst them. There was now a clear imperative to "do more from less" and with funding cuts of some 25% likely for the majority of government departments, there was a clear need to look even more closely at efficiencies and how policing does business in the future. As a result of that meeting, the President with colleagues identified six work-streams, which correlated with the themes outlined at the meeting by the Home Office, and nominated chief constables to lead each of the work-streams.
- 1.2.3 In addition, timescales were discussed and it became apparent that headline proposals would be required by the Summer recess when a public consultation document would be published with a view to including any statutory measures within the Police Reform and Social Responsibility Bill in the Autumn. The Home Office settlement arising from the Comprehensive Spending Review (CSR) would also be known in October and would provide more information on the detail of departmental budget cuts.
- 1.2.4 A further meeting during the 2010 APA-ACPO Summer Conference for chief constables and another with officials during the event clarified the priority areas for consideration and the even more challenging timescales involved. The President then wrote to all work-stream leads outlining the terms of reference under consideration and asking them for their professional views by no later than 8 July 2010. These headline proposals were initially discussed at a further meeting with the Home Secretary and Policing Minister on 7 July and then collated into a coherent report for the consideration of the Home Office.

- 1.2.5 This report draws together the work being progressed by a number of chief constables in their capacity as work-stream leads on behalf of the Association and the police service as a whole. It therefore details the professional views of those who lead the Service but is, by necessity at this juncture, a high-level summary of the work that has been undertaken to meet the challenging deadlines that have been set. A more detailed submission will be developed in response to any forthcoming public consultation. In the meantime, ACPO looks forward to a continuing dialogue during the consultative period and beyond.

### 1.3 FOCUS OF THE RESPONSE

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- 1.3.1 Information provided by the Home Secretary, Policing Minister and Home Office officials in recent weeks on the priorities for Government in terms of policing reform have provided the focus for this response; these priorities were adapted into six ACPO work-streams which are reflected below. To this end, this submission is structured along the following lines:

Chapter	Topic
1	Introductory remarks
2	Key reform themes
	2.1 Cost reduction
	2.2 Accountability, performance and inspection
	2.3 Local policing and partnerships
	2.4 Developing effective processes
	2.5 Workforce reform
	2.6 The policing landscape
3	Conclusion
4	Summary of recommendations

- 1.3.2 This report does not consider in detail the different policing arrangements for Wales. However, the devolved powers of the Welsh Assembly and different political landscape and partnership arrangements need to be taken into account before proposals are finalised.

### 1.4 PROTECTIVE MARKING

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- 1.4.1 This report is **RESTRICTED** and is NOT DISCLOSABLE under the FOI Act 2000.

## Chapter 2: Key reform themes

### 2.1 COST REDUCTION

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#### 2.1.1 Overview

The way that levels of service and protection are defended against falling budgets will be the defining issue for the police service over the next four years. Cost reduction, value for money (VfM) and making best use of remaining resources is the fundamental challenge that underpins all other considerations as a result of the current fiscal climate.

The period before the general election resembled a ‘phoney war’ where talk of cost reduction was muddled with concepts of efficiency. Undue emphasis was placed on uncontroversial areas such as procurement and bureaucracy. Only about 10% of police budgets are subject to procurement. Even an optimistic 10% saving could not realise more than an overall 1% budget reduction.

The profile of a typical force budget shows that 80% or more of expenditure is on people costs. Modelling of the impact of a 25% reduction in budget demonstrates that savings of this level can only be delivered by significant reductions in the head count of police forces.

#### 2.1.2 Budgetary reduction mechanisms

##### Recommendation 1

**ACPO seeks a shared understanding of the mechanisms required to deliver budgetary cuts.**

This understanding puts work on bureaucracy reduction and collaboration into a proper context. These are vital contributors to the question of how service delivery can be achieved with fewer staff but they are not, in themselves, direct mechanisms for cost reduction.

Additional clarity is urgently sought to understand the status of previous VfM initiatives. The £200m to be delivered by the ISIS programme, for example, is achievable but is largely the sum of initiatives that are already embedded in Force cost reduction planning. This ‘double-counting’ of savings could cause confusion.

##### Recommendation 2

**ACPO seeks agreement of a clearer baseline against which to judge progress against cost reduction targets.**

#### 2.1.3 Force modelling and disparity of funding positions

ACPO has undertaken an exercise in modelling force medium-term financial plans against an assumed 25% cut in budget, spread evenly over four years.

One obvious conclusion from this work is that every force faces a different challenge and that, counter-intuitively, the severity is not determined by size. Those forces that have accumulated reserves are better placed in the short term, while it is also clear that forces are in very different states of preparedness. On current knowledge, forces that have a higher gearing towards grant are more severely affected than those more reliant on precept.

**Recommendation 3**

**Home Office, supported by ACPO and the APA, should review the funding formula principles to address the current disparity between local/national funding at force level.**

Further analysis needs to be undertaken to understand the impact of the withdrawal of grant funding and, in particular, funding from other agencies. For example, some 50% of PCSOs are funded through grants provided primarily by local authorities. Reductions or removal of such grants will magnify the impact of core budget cuts.

**Recommendation 4**

**ACPO should consolidate and share an understanding of risk presented by changes to grant regimes.**

**The sum of the analysis so far undertaken confirms that projected budget reductions will render a number of forces 'unviable' at different points over the four year period.**

**Recommendation 5**

**ACPO, APA and Home Office should develop and maintain a shared risk profile of individual forces.**

Even forces not under direct threat will require significant and fast delivery of new flexibilities to allow critical services to be protected. These include issues of structure, workforce reform and bureaucracy reduction addressed later in this report.

It is accepted that cost reduction will be delivered by the combined impact of national change and local action. The local impact of national changes is not yet clear but needs to be articulated for planning purposes.

ACPO is ready for the challenge of protecting critical services whilst delivering budgetary reduction. Home Office must be radical in providing the police service with the necessary flexibility.

## **2.2 ACCOUNTABILITY, PERFORMANCE AND INSPECTION**

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### **2.2.1 Overview**

ACPO notes that efforts to strengthen the tripartite system of governance are central to the Government's agenda and have a resonance beyond policing. We acknowledge the government's drive to replace bureaucratic accountability with democratic accountability – this is welcomed by ACPO with some caveats.

### **2.2.2 Operational independence**

Unsurprisingly, the primary concern of ACPO is to ensure that responsibility and accountability for operational decision making (operational independence) remains with the Chief Constable. This is regarded as a critical protection against political interference and the misuse of police powers and resources. In our judgement this does not require legislation.

**Recommendation 6**

**ACPO notes the assurance from government that operational independence is retained by chief constables within the new (as yet undefined) arrangements.**

**2.2.3 Local accountability and directly elected individuals (DEIs)**

The most far reaching changes are to the arrangements for local accountability.

Our current understanding of the primary duties of the DEI are that they will be: appointing (and removing) the chief constable, setting a budget and agreeing a strategic plan. These are understood although we have yet to have the opportunity to see any detailed proposals on this critical change. There is some concern that an active political figure would seek engagement beyond these issues.

Establishment of new local arrangements for accountability provide an opportunity to address existing blurred lines of accountability between the chief constable and the police authority. It is our view that the chief constable should take responsibility in the new arrangements for appointing (and removing) other chief officers within their team, employing police staff, and managing contracts, assets and internal audit.

**Recommendation 7**

**ACPO urges that a clearly articulated role description be developed for the DEI and that chief constables are better enabled to deliver by taking direct responsibility for their resources.**

There has been discussion about the DEI adopting a wider local role that could embrace responsibilities for criminal justice and wider community safety issues. The opportunity presented by new arrangements to bind together these services to improve local delivery at reduced cost and with less bureaucracy should be taken.

**Recommendation 8**

**ACPO supports the principle of widening the DEI role into criminal justice and community safety issues.**

A significant gap in thinking surrounds the issue of the DEI's relationship with local authorities. It is acknowledged that such a relationship is important but the notion of the DEI being subject to local authority scrutiny carries significant risks that the DEI becomes overly dominated by local government and that policing becomes a sub-set of the municipal world. **ACPO opposes the notion that the DEI be subject to local authority scrutiny processes.**

Key to the success of this approach will be the DEI's willingness to share accountability for policing issues beyond the local. New local accountability must not increase risk to the public by delaying progress towards interoperability. Nor can it undermine value for money by slowing down efforts at collaboration. Serious and organised crime and other national policing issues must be part of the platform on which candidates seek election.

**Recommendation 9**

**ACPO contends that the DEI must be given duties to take account of policing issues and arrangements beyond the local.**

**2.2.4 Checks and balances**

There have been talks about ‘checks and balances’ to ensure that the DEI operates within the spirit of the new tripartite arrangements. ACPO has particular concerns that arbitrary behaviour could adversely affect the relationship between the DEI and chief constable. As often stated, ACPO does not consider that it is for chief constables to determine arrangements for their own accountability. This is a risk owned by government. **ACPO is clear that risk associated with the election of DEIs and any consequent checks and balances introduced are properly a matter for government.**

It is probable that some DEIs will also have a national role within the governance of policing. It would not be appropriate to create an ‘elected APA’ with the costs that would accompany it. At the local level, the change from police authority to DEI must be accompanied by a significant reduction in direct costs and indirect costs to forces.

**Recommendation 10**

**ACPO would suggest that the DEI should operate in a non bureaucratic manner at reduced cost.**

The Home Secretary forms the third limb of the tripartite system. The role of the centre, however, would benefit from clear definition, particularly in respect of ensuring the public protection from serious harm [protective services] and interoperability.

**2.2.5 Role of the centre**

ACPO welcomes the government’s intention to redefine and reduce the role of the centre in respect of performance management. It is recognised that there will be a need for some nationally available headline data – that has integrity – for transparency and comparative purposes but it should be without central analysis and judgement, and only long-term chronic failure should result in a national escalation process.

**2.2.6 Performance management and inspection****Recommendation 11**

**ACPO suggests that central performance management should focus on protective services/interoperability.**

There needs to be a distinction drawn between proper accountability and performance management; performance management is the responsibility of the chief constable. Emphasis must be placed on delivery against the local plan which reflects both local priorities and wider responsibilities, e.g. in respect of protective services/interoperability.

The burden and confusion of regulation must be substantially reduced.

**Recommendation 12**

**ACPO supports the one regulator model for the police service [HMIC] or, at the least, that HMIC have clear gate-keeping responsibilities/powers in respect of other regulators.**

**2.3 LOCAL POLICING AND PARTNERSHIPS**

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**2.3.1 Overview**

Local policing is the bedrock of the Service supporting and supported by efforts to combat threat and harm above the local level.

Our relationship with the public we serve is the source of our legitimacy and consequently our effectiveness. We want communities to feel that they are, and will be, treated fairly and to believe that we are there to support them. This requires us to put people before process, and to recognise that the achievement of higher levels of public confidence is not an end of itself, but an enabler to achieving lower levels of crime and safer communities. However, local legitimacy and confidence are key to success across the policing mission.

We are not the sole arbiters of what is good for communities, but similarly communities do not always have the full picture of the threats that policing must address. Putting the public first therefore is neither a patrician approach of 'we know best' nor total subservience to communities' wishes on a particular day. Government can help to forge a partnership between people and police; on the one hand freeing up the police from the bureaucracy and targets that choke real localism, and on the other hand providing the incentives, training and encouragement for people from all walks of life to help to police their own communities.

**2.3.2 Local policing**

Effective neighbourhood policing is critical, however, local policing is more than the contribution of Neighbourhood Policing Teams; it is the full service of response, investigation and problem solving available across all our communities. **ACPO is committed to supporting local policing as a critical part of a wider service to protect and serve the public.**

The dismantling of the target culture and the further development of discretion based policing will allow local officers more latitude in protecting and serving their communities.

Engaging with these communities to understand need and feedback progress is critical to developing public confidence. The service needs to move beyond a process view of engagement driven by the Policing Pledge and explore new and exciting ways to network and create feedback. Utilising new technology can be more impactful and less time consuming.

ACPO believes technology can also be harnessed to permit a greater transparency in the way that the public are informed about policing and crime levels.

**Recommendation 13**

**ACPO recommends and supports further steps to improve engagement with, and the flow of, information to the public.**

Engagement can develop into more active participation in policing in its wider sense. This can involve anything from reporting of crime on line, volunteering through traditional or new routes, to active support for the criminal justice system. **ACPO would seek to build customer participation more effectively into service delivery.**

### 2.3.3 Partnerships

The police have a long history of partnership working, however, the word partnership is often synonymous with talking shops, driven by process and saturated by plans, meetings and targets. The true value of working together is in building a relationship where local people have more say over local delivery. The whole criminal justice system could be more effective by forging a common understanding of local priorities and expectations. Effective policing can be undermined by ineffective sentencing, courts, prisons and probation services – consistency of purpose is essential across the whole criminal justice service.

That said, partnership has been at the cornerstone of the BCU model. Nevertheless, it is true to say that the transaction costs of conducting partnership working can outweigh the benefits. The government's strategic view of partnership is unclear, as is its attitude to Total Place and other initiatives that would deepen partnership arrangements.

#### Recommendation 14

**ACPO suggests a move to draw on the significant benefits of partnership working while challenging the culture of 'meetings and reports'. Establishing the broader role for the DEI – as mentioned earlier – is critical in this regard.**

It is clear that local policing will come under the same general resourcing pressures as other aspects of policing. Delivery with lower numbers will require a change of mindset away from one that is dominated by input issues, with language such as 'visibility' and 'resilience', to an approach based on outcomes.

Partnership efforts directed at public protection, e.g. child protection, domestic abuse, vulnerable adults abuse, drugs, alcohol and mental health services, may be diminished by agency or departmental budget cuts. The cumulative effect on public protection must be understood.

#### Recommendation 15

**ACPO would urge government to understand the risks, and ensure cross departmental co-ordination that enables integrated service delivery locally.**

**ACPO is clear that local policing must become outcome rather than input led.**

With the current fiscal climate driving the need for as much flexibility as possible at a local level in terms of resources and funding, ACPO would seek the removal of ring-fencing for PCSOs. However, whilst local policing will remain a priority commitment it will have to be delivered alongside action taken against other potential causes of risk and harm.

#### Recommendation 16

**ACPO believes that the ring fencing of PCSO budgets should cease.**

## 2.4 DEVELOPING EFFECTIVE PROCESSES

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### 2.4.1 Overview

The new changes to accountability offer an opportunity to change radically many of the bureaucratic processes that absorb cost and can act as a barrier to service. Once again, these changes do not in themselves deliver cost reduction but permit greater effectiveness against a lower cost base.

### 2.4.2 Criminal justice

**Criminal Justice is one of the key areas to consider. Renewed impetus is being put behind proposed changes which include familiar areas, such as, single case management and changing the boundary of charging decisions.**

It is one of the key areas where significant savings can be achieved across agencies whilst at the same time delivering efficiencies and better outcomes for all stakeholders. This can be delivered through returning some charging decisions to the police, centralised charging advice in volume cases via telephone, developing a single case management system for police/CPS and electronic exchange of information, agreeing a standardised national file and processes, sharing administration staff (police/HMCS), extending use of virtual courts and court hours and prison reception, and by increasing sentencing powers of magistrates. Most of these initiatives (and there are others) have already been successfully piloted or are under development; however the impetus needs to be maintained to ensure the changes are driven through to achieve the considerable benefits and savings available.

Existing work will be accelerated by the removal of targets which will encourage a more organised and consistent approach to non-judicial disposals and by resource pressures that will draw criminal justice partners together. With the Policing Minister's role in both relevant departments there is an opportunity to deliver significant change.

#### Recommendation 17

**ACPO supports the criminal justice reform proposition being driven through its Criminal Justice Business Area.**

### 2.4.3 Crime recording

A second major opportunity exists around crime recording. The Smith Review raised the important debate about the UK's approach to crime recording and the very significant advance of the 'crime definition net' which is capturing many hundreds of thousands of offences that would not previously have been recorded as crime.

The impact of this over-classifying is to create a tail of bureaucracy and supervision and to make customer focussed responses more difficult to achieve. The political sensitivity of this area is well understood but there will never be a better time to undertake significant reform and to begin to de-politicise crime.

#### Recommendation 18

**ACPO strongly supports the reform of crime definition and recording processes.**

#### 2.4.4 Risk, bureaucracy and empowerment

There are many other areas of police business that could be considered from a process change perspective, intelligence and RIPA are but two examples.

##### Recommendation 19

**ACPO recommends that the future focus of anti-bureaucracy effort be on high impact process areas.**

There has been considerable debate over the proliferation of doctrine and guidance within the service; the debate risks oversimplifying some critical issues. The problem may be less about the length of the guidance and more about its application to a general audience within the Service.

**ACPO will ensure that policing decisions are driven by the values and professional judgement of its staff.**

The other driver of excessive bureaucracy has been the attitude to risk. Bureaucracy is partly due to the 'just in case' mentality that drives over recording and a defensive mentality. It is also a function of over regulation and over complicated rules and procedures.

To assist the front-line, ACPO has developed a simple tool to aid decision-making and reduce unnecessary bureaucracy; the National Decision Making Model (NDMM).

##### Recommendation 20

**ACPO supports the development and wider communication of the National Decision Making Model.**

Health and safety legislation is often discussed in this context and has become the public embodiment of the 'risk culture'. ACPO commends the high-level statement between the Service and HSE on the application of health and safety legislation to the Service.

##### Recommendation 21

**ACPO supports efforts to avoid the negative impact of health and safety legislation.**

ACPO looks forward to working with the government to challenge bureaucracy. Applying the principle of proportionality to the way key processes operate can create the virtuous circle of improved morale, better service and reduced costs.

## 2.5 WORKFORCE REFORM

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### 2.5.1 Overview

It is accepted that much of the flexibility required by the new economic constraints must come from workforce reform. **The changes themselves are not capable of closing the financial gap but they will enable better service delivery through a smaller, more professional workforce.**

Government has stated that it would wish to see chief officers standing side by side with government during the implementation of any necessary reforms. **Chief officers are more than willing to confirm their personal leadership role in progressing workforce reform.**

In the main this section will focus on police officers but touches upon elements of police staff employment that require further consideration in order to maintain service delivery and ensure value for money.

### 2.5.2 Office of constable

Reform begins by restating a position.

The office of constable means a police officer has the additional legal powers of arrest and control of the public given to him or her directly by a sworn oath and warrant. Each sworn constable is an independent legal official; they are not agents of the police force, police authority or government. Each police officer has personal liability for their actions or inaction.

The employment status of a police officer is therefore a unique one. Police officers have access to most statutory employment rights but their right to withdraw labour was removed by statute (Police Act 1919) following strikes in 1918 and 1919.

#### Recommendation 22

**ACPO therefore believes that the crown status of the office of constable is essential and should be preserved as a fundamental tenet that supports operational independence.**

Behind that concept, however, is plenty of scope to create a simpler, less bureaucratic and more flexible framework for the employment of police officers.

### 2.5.3 The employment framework for police officers

Police officers' public and, in part, their personal lives are also regulated through legislation. The Police Regulations 2003 contain provisions, amongst other matters, regarding ranks, conditions of service, appointments, probation, retirement, personal records, duty, overtime, leave, pay, expenses allowances, uniform and equipment. The Secretary of State makes determinations after consultation with the Police Negotiation and Advisory Boards. These determinations contain changes to police pay and conditions of service as part of the Police Reform programme.

#### Recommendation 23

**ACPO firmly recommends that a more flexible framework for employing and rewarding police officers be developed urgently.**

### 2.5.4 Unsatisfactory Performance Procedure (UPP)

UPP is very rarely used to address unsatisfactory performance due to the fact that it is highly bureaucratic and there is a need to make the procedure simpler and swifter to address poor individual performance. This should come as part of the longer term review of pay and conditions (see later) but, given it is a tool which directly impacts on the effective management of current resources, it is worthy in itself of specific examination in faster time.

**Recommendation 24**

**ACPO therefore recommends an urgent review of the UPP.**

**2.5.5 Volunteers and Specials**

The continued and sustained recruitment of volunteers and specials is essential to workforce reform to ensure that the service remains citizen focussed and in line with a “Big Society”.

**2.5.6 Reward and recognition**

There are a range of measures that have been added to the core reward mechanisms such as: Special priority payments (SPP), competency-related threshold payments (CRTP), superintendents’ post-related allowance and chief officers’ performance pay that could be abolished in the short-term and would produce some cash savings.

**Long term - strategic aims of a pay and conditions review**

The following strategic aims are a sound articulation of what ACPO believes is required from a pay and conditions review:

- The ability to recruit and retain a highly motivated single workforce, even if there remain some differences in terms and conditions
- Recognition of skills and competence in support of increased professionalisation of the Service coupled with a simpler and swifter unsatisfactory performance procedures
- Recognition of the working hours required of police officers and police staff especially reflecting the 24/7 nature of policing
- Arrangements that are sufficiently flexible to enable the Service to adapt to changing circumstances and demands
- Whilst retaining a core of nationally negotiated arrangements there needs to be some local discretion over the distribution of pay and rewards with pay perhaps to have some regional relevance i.e. tied to more local job markets / pay rates
- Any new proposals must be affordable recognising the reality of the current financial climate
- New proposals must require only minimal bureaucracy and be easily understood
- There must be an ability to provide incentives to encourage officers and staff to progress either horizontally or vertically, i.e. through specialisms or promotion
- De-bundling pay rates for police officers e.g. only pay shift allowance for actual shift working – currently included in basic pay for all.

**Short term – Immediate cash releasing measures**

Immediate savings, in respect of police officers, could be achieved through abolishing the following additional payments and performance pay:

- Special priority payments – It is proposed that this should be abolished and replaced by a new simpler arrangement that gives the chief officer the option to make an additional payment to an officer up to a given amount or up to a percentage of the pay bill in certain circumstances, e.g. particularly demanding roles or to attract officers to less popular geographical areas however, the replacement scheme must be optional, flexible and simple.
- Competency Related Threshold Payments
- Superintendents Post Related Allowance and performance related bonuses
- Chief officer performance pay scheme

Additionally, through reducing compensation for working overtime, rest days, public holidays and annual leave as follows:

- Public holidays are expensive – reduce payment from double time to time and a half
- Pay the actual hours of overtime worked – as opposed to the minimum of 4 hours currently paid on rest days, public holidays and recalls to duty
- Modernise the concept of the ‘police day’ thereby removing the trigger for enhanced overtime compensation on rest days, public holidays and leave days
- Cancelled rest days are expensive – reduce compensation periods to just less than 5 days notice and reduce payment to time and a half
- Variable shift arrangements – enable chief officers to introduce more efficient shift patterns following consultation with the Police Federation Joint Branch Board rather than needing their agreement, as is currently the case
- Separate shift payments for officers and only pay if shifts actually worked.
- For police staff, provide reduced and consistent protection periods when changing jobs/duties and losing allowances or shift/weekend payments.

#### **Recommendation 25**

**ACPO proposes that there be a complete overhaul of the flexible reward mechanisms that are currently in place in order to deliver some immediate cash savings and provide chief officers with critical flexibility.**

#### 2.5.7 **Police pay and reward machinery**

There are real concerns that the antiquated manner of operating that exists within PNB at the current time will not be capable of delivering at speed and thus will inhibit the ability of the Service and government to rectify existing issues and ensure the necessary flexibility that will be required to manage the workforce through this difficult and challenging period of critical workforce reform.

#### **Recommendation 26**

**ACPO accordingly urges the replacement of PNB with a pay review body.**

The role of workforce reform continues to be a subject of debate within the service. Significant changes to police officer pay and conditions may cause a more general reassessment. Agreed territory is support for simplification of role, clarity and differentiation over the differing roles and requirements for police staff as opposed to police officers posts and a more focussed approach to training and deployment.

ACPO believes that police efficacy should not be measured by the numbers of officers but how they are used and the outcomes they achieve. We believe the future of the Service is in having a smaller number of more highly trained officers working to clearer professional standards and supported by police staff colleagues who take on tasks, which do not require police skills and powers.

#### 2.5.8 **Police pensions**

Entitlement to a police pension has always been regarded as a key element of the remuneration of police officers to enable them to undertake their role with confidence. The arrangements under the Police Pension Scheme 1987 and the New Police Pension Scheme 2006 offer a range of benefits that provide financial security both in the time up to retirement and beyond. Both schemes are controlled by formal regulations.

It is accepted that police pensions are part of a wider public sector review to which ACPO will be submitting a detailed response.

**However, new flexibility is required urgently as it will be a substantial element of managing service with fewer officers.**

#### 2.5.9 Police rank structure

The complexity of policing and the risks that it carries requires a leadership and management structure, which creates clear lines of accountability and the level of expertise that can safeguard risks. There is an appetite for challenging the current rank structure and moving away from rank towards expertise as a more important defining factor. The rank structure needs to create opportunities and the space to take on greater responsibility and greater ownership.

The removal of the bureaucratic, target driven culture also provides opportunity to re-examine rank structure and ratios.

#### Recommendation 27

**ACPO supports a review of the rank structure and ratios.**

#### 2.5.10 Police staff

A gradual evolution has led to a multiplicity of police staff roles, job descriptions and pay arrangements. There needs to be further exploration of the possibility of creating a clearer national framework for police staff. This would also enable the creation of clearer career pathways for police staff.

#### Recommendation 28

**ACPO supports the need for a further exploration of a clearer national framework for police staff.**

#### 2.5.11 Operational resilience

Concern has been expressed over the extent of civilianisation or the number of police staff that can be employed in favour of police officers to retain operational viability in times of need. Operational resilience is crucial to deal with extreme events. This comes from the flexibility offered by the employment status of the office of constable but also from greater flexibility in the wider police family. It is important therefore, that officers and staff are placed and functioning in the right roles so that more specialised officers can be identified and mobilised quickly and efficiently. Police staff will need to have broader job descriptions which create more flexibility and mobility in order that full support can be given across the policing spectrum. There should also be a widening of the role of PCSO so that they can contribute to further policing activities whilst not necessarily increasing their powers.

#### Recommendation 29

**ACPO recommends a national review of police staff role profiles to ensure they are sufficiently broad to maintain flexibility and mobility and that the role of the PCSOs be extended so that they can contribute further to policing activities – but without increasing their powers.**

It would, finally, be easy to see workforce reform as a purely efficiency driven task. This will be a period when the workforce is rapidly reshaped. Employment practices and reward structures must be capable of supporting and incentivising change and permitting officers to leave the service with dignity.

**Whilst this section has primarily focused on police officers, it should be acknowledged that there are many inflexibilities and inefficiencies in the way that police staff are employed.**

## 2.6 THE POLICING LANDSCAPE

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### 2.6.1 Overview

ACPO welcomes this opportunity to influence the debate over the rationalisation of the national and local policing landscapes. ACPO has long sought the opportunity to review and reform its own role and status, which do not at present support either its current set of responsibilities at a national level or its ambition to truly act as the leading professional organisation for the police service. Linked to this national perspective is the belief that one of the greatest strengths of UK policing is its connectivity from local, neighbourhood policing through protective services to international policing. ACPO would argue that this operational connectivity must be maintained at all costs. The following paragraphs consider the vertical integration of policing and the need to de-clutter the national landscape.

### 2.6.2 Operational connectivity – the vertically integrated police service

On many measures, policing in the UK has never been more successful with there being the lowest risk of being a crime victim for over 25 years, record numbers brought to justice – and the consequence that our prisons are full and a police service that has the strategic capabilities to address serious harm.

Nevertheless, In spite of reducing crime the public in the early 21<sup>st</sup> century do not feel safer, nor, in general, better served by the police service.

ACPO's response, which was adopted by government, has been to restructure policing to enable a better connection between the police and local communities that we serve; through Neighbourhood Policing.

#### Recommendation 30

**Neighbourhood Policing is and will remain a fundamental part of local policing delivery and ACPO recommends a continuing commitment to this style of local policing.**

Local policing informs and supports operational activity to protect the public from serious threats, harms and risks. For example, street drug dealing might be a neighbourhood policing priority, but it also provides intelligence and an opportunity for leverage on the organised crime groups involved in drugs importation, supply and distribution. Furthermore, the recent history is littered with examples of terrorist threats that have been neutralised through community information provided to the local police.

ACPO developed a current CT infrastructure as a response to new terrorist threats which have an international and local dimension. The current infrastructure is the most cost effective model for meeting that threat. In partnership with Security Service and other National Security Agencies, including also UKBA, the work of the CTU/CTIU/Special Branch capability is tasked and coordinated

from the centre against priority targets. **The infrastructure is the envy of all countries facing a terrorist threat and should be secured for the future.**

#### Recommendation 31

**ACPO proposes maintaining the hub and spokes model of CTU capability, tasked and coordinated by the centre for normal investigations, commanded and controlled by the centre at times of critical incidents.**

ACPO is moving to a distributed model of ownership of operational CT strategy and policy thereby enabling the contraction of the centre to ensure VfM.

It may be possible in the future financial environment, to rationalise the infrastructure. Whilst options surround the rationalisation of these 4 levels, depending upon how much money needs to be saved, the principle ACPO recommendation is that CT needs to remain connected from the local to the international.

The greatest national strategic threat alongside terrorism is the growth of serious and organised crime. Accordingly, a more pressing issue from ACPO's perspective is unfinished business on the wider national approach to serious and organised crime. This is an opportunity to secure a renewed focus and capability in addressing serious and organised crime and is particularly urgent given that so much of the current capability is funded through special grants.

The Serious Organised Crime Agency (SOCA) was created in 2006 and it took on the functions of both NCS and NCIS. ACPO would say that the mission of SOCA has been stretched beyond that addressed by its two precursor agencies but that the capacity and capability to investigate and address serious and organised crime has failed to keep pace with the growth of the threat and harm.

There should be greater intelligence sharing (both ways) between local forces and SOCA. This may mean a shared intelligence IT capability and strict rules around access to the databases. It is important, however, (see above), that SOCA be involved in tasking and coordinating resources against national threats from OCG's.

#### Recommendation 32

**ACPO supports the intention to appoint a chief constable to lead SOCA and recommends that it should be refocused and resourced to enable it to provide adequate supplementary assistance to the capability of forces to tackle serious organised crime.**

In the absence of sufficient SOCA resources to meet the national threat from serious and organised crime, ACPO have put in place regional arrangements. These "bottom up" arrangements have been pump prime funded by small ring fenced grants. ACPO foresee the danger of the removal of ring fenced funding impacting upon the continued deployment of these resources. **Furthermore, ACPO are concerned about the priorities of a locally directly elected individual (DEI) in continuing to support this regional activity which is addressed in more detail in the Accountability and Performance section of this submission.**

**Recommendation 33**

**ACPO proposes that a national approach to policing should be clear about the anticipated capability that should contribute to the fight against serious and organised crime.**

In shorthand, there should be a capability and an infrastructure to match the CT model.

**Recommendation 34**

**ACPO therefore proposes that a new government, redefining the national landscape, should seek to secure a renewed focus and capability in addressing serious and organised crime.**

The ACPO position regarding this capability is that local ie: force-wide coordination intelligence is fit for purpose. The Regional Intelligence Model and the Regional Counter Terrorism Units provide the means for sharing cross-border intelligence.

**Recommendation 35**

**ACPO recommends an intermediate capacity and capability based on Regional Intelligence Units be retained and embedded within the police service as part of any future National Policing Plan.**

A means of funding a greater capacity to tackle serious and organised crime is to create the opportunity for seized and forfeited criminal assets to build that capability.

**Recommendation 36**

**ACPO proposes that legislation should shift the burden of responsibility from that currently, whereby the police have to prove criminal gain, to one in which the person from whom seizures are made should have to prove honest appropriation.**

In addition to the change of legislation, the police service receives a minority of the funds captured under the Proceeds of Crime Act (POCA).

**Recommendation 37**

**ACPO recommends that a greater majority of the proceeds of crime that are seized or ordered for forfeiture should be channelled into supporting the police capacity and capability to tackle such criminals.**

ACPO acknowledges the government determination that they will not countenance the enforced merger of police forces. However, in any document advising Government we are obliged to offer our professional view, which is that the most effective and efficient means of delivering local policing and protective services is through a smaller number of strategically sized Forces (first set out in "Where next for the Police Service – an ACPO position paper" November 2006). See also the Cost Reduction section of this submission.

**Recommendation 38**

**ACPO therefore recommends that consideration should be given to reviewing the number of existing forces with a view to developing an organised road-map for the reconfiguration of forces to a smaller number of strategically sized forces that will support the delivery of both local policing and protective services.**

Nevertheless, ACPO accepts the political reality of the situation and notes that there is no such obstacle to voluntary mergers taking place, acknowledging the additional test of local public support that is required. That said, the new economic reality will make a number of forces unviable – some sooner than others – thus in all likelihood the prospect of force amalgamation may well be placed back on the table. There will need to be a plan for this potential outcome.

However, in the meantime, it is suggested there must be some degree of central control over the process of ‘voluntary’ amalgamations to avoid the development of a sub-optimal structure for policing.

**Recommendation 39**

**ACPO thus proposes that some form of central control over the process of voluntary mergers must be established in order to negate the development of a sub-optimal structure for policing.**

**2.6.3 Developing collaboration on protective services**

After the collapse of mergers, the preferred option for meeting the joint requirements of efficiency and protective services was collaboration. Collaboration was intended to develop through Forces “bottom up” assessing the benefit of collaborative working. The depth and breadth of collaboration in the 4 years since the collapse of mergers has been mixed. There are many examples of two or more forces coming together to address a protective services requirement but it is a patchwork quilt and there are un-grasped opportunities.

Obstacles to achieving bottom up optimisation of collaborative benefit are:

- Sovereignty issues
- Financial issues
- Political issues
- Different priorities and different levels of capability in forces
- Net donor syndrome, which is the perception that each Force will fail to maximise the benefit of the joint endeavour
- No overarching pressure to drive the agenda.

ACPO previously contributed to a work programme under the chairmanship of HMIC, called “Subsidiarity – The Drivers for Collaboration”. This work envisaged a spectrum, or ladder, of collaboration defined by the stages of free choice; encouragement to collaborate; informed choice (the belief that if the evidence was strong enough that individual Forces and Authorities would create partnerships); directed funding (evidenced in the regional serious and organised crime capability and in the current Air Support initiative); and finally, mandate by the Home Secretary.

**Recommendation 40**

**ACPO’s view is that for collaboration to be optimised across the Service the programmes need to be directed by government.**

This can be through directing funds in a way other than dividing up the whole police budget so that government direct the spending on collaborative projects, in full or part. Alternatively, the Home Secretary could use her powers to direct certain services to be provided by a group of Forces rather than each one.

There are a range of back office and operational support services which are generally agreed by ACPO to be those that would benefit by being delivered at a level beyond the individual force.

#### Recommendation 41

**ACPO believes that the Government should give direction, through incentivisation or mandate, to delivering a range of back office and operational support services against a national framework where cost savings can be evidenced and maximised.**

The appointment of the DEI will require a clear articulation of the political limits of collaboration and the need for the DEI to accept shared accountability for delivering policing beyond force boundaries and in collaboration with others. See also the Accountability and Performance section within this submission.

#### Recommendation 42

**ACPO therefore seeks some form of statutory obligation for DEIs to undertake collaboration and for a clear articulation of the political limits of collaboration.**

In respect of Protective Services, they should be delivered against a clear framework of threshold standards.

#### Recommendation 43

**ACPO therefore believes that Protective Services should be delivered against ACPO standards and a clear plan which encourages services, such as, uniformed operations support, serious crime investigation and major crime investigation, to be delivered in a value for money fashion within a regional or sub regional context.**

### 2.6.4 Enhancing operational interoperability

Operational Interoperability is defined as a seamless working relationship between different units and personnel based on a number of enshrined principles. Operational Interoperability is imperative to ensure protection of the public and to ensure public confidence that the police service across the UK has the operational capability to deal rapidly, effectively and seamlessly with any significant threat, risk, harm and/or capacity issue.

There will continue to be a growing need to bring together assets as no organisation has sufficient capability or capacity to go it alone and deal independently with significant threats, risk or harm.

Interoperability should only be required where it is necessary to meet significant threats and where there is a probability of multi-force involvement. The current assessment is that this would relate to CT, serious & organised crime and large scale events and would apply to the operational areas of policing of surveillance, firearms, public order, CBRN and technical surveillance.

In order to effectively deal with the threat and meet public expectations, there is a need to accelerate the pace of change. Striking an effective balance between consultation and consensus has proved challenging in a number of areas. ACPO needs to be able to consult all forces and set the national direction and agree standards required in those areas that demand interoperability.

#### Recommendation 44

**ACPO supports the inclusion of Scotland and Northern Ireland in any approach to interoperability that is applied.**

It will be necessary to resolve current overlaps between the responsibilities of ACPO and the NPIA to allow the de-cluttering of parallel projects which are aiming to achieve consistency and single programme governance. **ACPO believes that ACPO (once reconfigured – see below) is best placed to bring clarity to standards and a programme of work to achieve interoperability.** The work of NPIA in this area would therefore pass to ACPO.

#### Recommendation 45

**ACPO therefore recommends that it takes responsibility (within a newly reconfigured structure and accountability framework that acknowledges the other changes in this area) for the programme of work required to deliver effective interoperability.**

Finally, ACPO acknowledges that reform of the policing landscape is critical to the delivery of a more rational set of bodies whilst acknowledging that any new alignment must ensure operational connectivity from local policing to protective services and beyond. **ACPO would therefore urge a radical approach at every layer.**

#### 2.6.5 The role and status of ACPO

ACPO is an Association of [independent] Chief Police Officers. We present as an Association in equal and active partnership with government and the Association of Police Authorities (APA). ACPO leads and coordinates the direction and the development of the police service in England, Wales and Northern Ireland. In times of national need, ACPO - on behalf of all chief officers - coordinates the strategic policing response.

ACPO, by the definition above, relies upon the consent of its associated members, to make progress. The Association must retain its independence from government whilst having a clear, transparent accountability structure. **The precise vehicle for achieving this status will need to be considered further but from our initial explorations, it would appear that conferring chartered status on ACPO would deliver more transparent governance whilst facilitating its ambition to act as the professional lead for the Service.** Chartered status will also ensure that ACPO retains its independence of government and thus its ability to inform and advise from a purely professional perspective.

ACPO readily recognises that in a changing world with new accountability structures, its own governance structures must make it accountable to not only those who fund it – both directly and indirectly – but to those who have an elected mandate for policing. Thus, the development of ACPO's role would require a greater degree of external scrutiny and accountability. It is feasible that accountability arrangements for ACPO could in the future consist of a Board of some configuration.

**Recommendation 46**

**ACPO proposes that it be placed on a statutory footing to facilitate its ability to undertake a broader range of responsibilities and deliver a more transparent accountability structure and that conferring chartered status would deliver all that is required whilst balancing our need to be independent.**

In its new form, ACPO has the potential to take on the following functions that are currently being delivered by the NPIA and which more appropriately sit with the leading professionals within the police service:

- Develop and agree standards that ensure the professional reputation and capability of the Service as a whole.
- Review critical incidents and major investigations to learn lessons for the Service as a whole.
- Undertake the delivery of operational support services.
- Provide peer support for colleagues.
- Oversee and deliver capability support for forces.
- Advise government on strategy for training and development of its officers and staff. This would involve, particularly, a strategy for developing its future leaders.
- Implement the strategy for the development of training including running of the national leadership college under the direction of a chief constable.
- Liaison, on behalf of England, Wales and Northern Ireland, with international law enforcement agencies.
- The development of a National Policing Plan agreed with Government, having regard to all aspects of policing and protective services that need to be delivered at a level above the local force.

The development of ACPO along the lines above requires a rebalancing of other parts of the national landscape and whilst ACPO recognises the contribution that NPIA has made, we want to explore more cost-effective delivery mechanisms.

**Recommendation 47**

**ACPO believes that the responsibilities for doctrine and standards development; training and leadership development; serious crime and critical incident analysis and debrief and other responsibilities as described above, could all be undertaken by an appropriately resourced and established ACPO.**

It is clear that **ACPO could be reconfigured to enhance many aspects of the NPIA embraced within a chartered institute framework.** However, an Agency would still be required to develop, deliver and maintain the various databases, technology and communications infrastructure. There are a number of models for this but part of the work load could be delivered through some policy work being re-absorbed into the Home Office and other operational support responsibilities forming one arm of a single operational agency; the refocused SOCA.

None of these recommendations would interfere in any way with the operational independence of chief officers assured by this government.

### 2.6.6 A Border Police Force

Part of this new national landscape involves the creation of a Border Police Force which has been proposed by the new Coalition Government. The ACPO position has been well rehearsed and follows recommendation D6 in John Donlon's report – Border Policing the Next Steps – which was approved by ACPO in July 2008. This is the ACPO preferred model if government were minded to move to address structure more immediately.

#### Recommendation 48

**In short, ACPO recommends that form should follow function and that any structural change should be informed by a national strategic border review which, itself, would be informed by the ongoing national security review.**

However, it is understood that government are now minded to take a more cautious approach in fulfilling this manifesto pledge and Coalition Agreement mandate. If Ministers agree that a chief constable should be appointed to SOCA to task and coordinate border activity and to chair a National Border Security Group, ACPO would be willing to support the model being proposed at present as **Model 1+**.

#### Recommendation 49

**In line with this change in direction, ACPO would be willing to support the emerging recommendations to government described as Vic Hogg's model 1+.**

## Chapter 3: Conclusion

- 3.1 In the time available we have endeavoured to put forward some constructive proposals on the way forward. Overall, they describe a fairly radical change to the policing landscape, whilst preserving the cornerstones of British Policing; namely, local delivery and local accountability.
- 3.2 They also recognise the complexity of the policing mission, recognising that some services can be better delivered at a national level if we are to keep people safe. This complexity must be fully understood by whoever holds us to account or we will be in major difficulty. We await the detail on many of the matters discussed in this document, and hope that these views help to shape the new approach.
- 3.3 Finally there is now a great opportunity to position ACPO within a statutory framework for the first time, ensuring that there is greater transparency and understanding of the critical work we undertake.
- 3.4 We look forward to working closely with government and officials as more detail on these vital issues emerges.

## Chapter 4: Summary of recommendations

Number	Recommendation
1	ACPO seeks a shared understanding of the mechanisms required to deliver budgetary cuts.
2	ACPO seeks agreement of a clearer baseline against which to judge progress against cost reduction targets.
3	Home Office, supported by ACPO and the APA, should review the funding formula principles to address the current disparity between local/national funding at force level.
4	ACPO should consolidate and share an understanding of risk presented by changes to grant regimes.
5	ACPO, APA and Home Office should develop and maintain a shared risk profile of individual forces.
6	ACPO notes the assurance from government that operational independence is retained by chief constables within the new (as yet undefined) arrangements.
7	ACPO urges that a clearly articulated role description be developed for the DEI and that chief constables are better enabled to deliver by taking direct responsibility for their resources.
8	ACPO supports the principle of widening the DEI role into criminal justice and community safety issues.
9	ACPO contends that the DEI must be given duties to take account of policing issues and arrangements beyond the local.
10	ACPO would suggest that the DEI should operate in a non bureaucratic manner at reduced cost.
11	ACPO suggests that central performance management should focus on protective services/interoperability.

12	ACPO supports the one regulator model for the police service [HMIC] or, at the least, that HMIC have clear gate-keeping responsibilities/powers in respect of other regulators.
13	ACPO recommends and supports further steps to improve engagement ,with and the flow of, information to the public.
14	ACPO suggests a move to draw on the significant benefits of partnership working while challenging the culture of ‘meetings and reports’. Establishing the broader role for the DEI – as mentioned earlier – is critical in this regard.
15	ACPO would urge government to understand the risks, and ensure cross departmental co-ordination that enables integrated service delivery locally.
16	ACPO believes that the ring fencing of PCSO budgets should cease.
17	ACPO supports the Criminal Justice Reform proposition being driven through its Criminal Justice Business Area.
18	ACPO strongly supports the reform of crime definition and recording processes.
19	ACPO recommends that the future focus of anti-bureaucracy effort be on high impact process areas.
20	ACPO supports the development and wider communication of the National Decision Making Model.
21	ACPO supports efforts to avoid the negative impact of health and safety legislation.
22	ACPO therefore believes that the crown status of the office of constable is essential and should be preserved as a fundamental tenet that supports operational independence.
23	ACPO firmly recommends that a more flexible framework for employing and rewarding police officers be developed urgently.
24	ACPO therefore recommends an urgent review of the UPP.

25	ACPO proposes that there be a complete overhaul of the flexible reward mechanisms that are currently in place in order to deliver some immediate cash savings and provide chief officers with critical flexibility.
26	ACPO accordingly urges the replacement of PNB with a pay review body.
27	ACPO supports a review of the rank structure and ratios.
28	ACPO supports the need for a further exploration of a clearer national framework for police staff.
29	ACPO recommends a national review of police staff role profiles to ensure they are sufficiently broad to maintain flexibility and mobility and that the role of the PCSOs be extended so that they can contribute further to policing activities – but without increasing their powers.
30	Neighbourhood Policing is and will remain a fundamental part of local policing delivery and ACPO recommends a continuing commitment to this style of local policing.
31	ACPO proposes maintaining the hub and spokes model of CTU capability, tasked and coordinated by the centre for normal investigations, commanded and controlled by the centre at times of critical incidents.
32	ACPO supports the intention to appoint a chief constable to lead SOCA and recommends that it should be refocused and resourced to enable it to provide adequate supplementary assistance to the capability of forces to tackle serious organised crime.
33	ACPO proposes that a national approach to policing should be clear about the anticipated capability that should contribute to the fight against serious and organised crime.
34	ACPO therefore proposes that a new government, redefining the national landscape, should seek to secure a renewed focus and capability in addressing serious and organised crime.
35	ACPO recommends an intermediate capacity and capability based on Regional Intelligence Units be retained and embedded within the police service as part of any future National Policing Plan.

36	ACPO proposes that legislation should shift the burden of responsibility from that currently, whereby the police have to prove criminal gain, to one in which the person from whom seizures are made should have to prove honest appropriation.
37	ACPO recommends that a greater majority of the proceeds of crime that are seized or ordered for forfeiture should be channelled into supporting the police capacity and capability to tackle such criminals.
38	ACPO therefore recommends that consideration should be given to reviewing the number of existing forces with a view to developing an organised road-map for the reconfiguration of forces to a smaller number of strategically sized forces that will support the delivery of both local policing and protective services.
39	ACPO thus proposes that some form of central control over the process of voluntary mergers must be established in order to negate the development of a sub-optimal structure for policing.
40	ACPO's view is that for collaboration to be optimised across the Service the programmes need to be directed by government.
41	ACPO believes that the Government should give direction, through incentivisation or mandate, to delivering a range of back office and operational support services against a national framework where cost savings can be evidenced and maximised.
42	ACPO therefore seeks some form of statutory obligation for DEIs to undertake collaboration and for a clear articulation of the political limits of collaboration.
43	ACPO therefore believes that Protective Services should be delivered against ACPO standards and a clear plan which encourages services, such as, uniformed operations support, serious crime investigation and major crime investigation, to be delivered in a value for money fashion within a regional or sub regional context.
44	ACPO supports the inclusion of Scotland and Northern Ireland in any approach to interoperability that is applied.
45	ACPO therefore recommends that it takes responsibility (within a newly reconfigured structure and accountability framework that acknowledges the other changes in this area) for the programme of work required to deliver effective interoperability.

46	ACPO proposes that it be placed on a statutory footing to facilitate its ability to undertake a broader range of responsibilities and deliver a more transparent accountability structure and that conferring chartered status would deliver all that is required whilst balancing our need to be independent.
47	ACPO believes that the responsibilities for doctrine and standards development; training and leadership development; serious crime and critical incident analysis and debrief and other responsibilities as described above, could all be undertaken by an appropriately resourced and established ACPO.
48	In short, ACPO recommends that form should follow function and that any structural change should be informed by a national strategic border review which, itself, would be informed by the ongoing national security review.
49	In line with this change in direction, ACPO would be willing to support the emerging recommendations to government described as Vic Hogg's model 1+.