

FIT FOR THE FUTURE:

The case for a reformed national policing landscape

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The production of this paper involved extensive engagement with individuals considering police reform at the national level, and wider input from across policing. We are deeply grateful for the time and insights shared to improve our analysis and recommendations.

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1. Introduction

This discussion document aims to promote debate about the best ways to organise our national policing institutions, resources, and processes to support effective policing, reduce crime and promote safer communities. We hope to contribute to the development of options prior to the government publishing a white paper on police reform in the coming months. We believe that a big reform to the landscape could unlock major benefits in terms of police efficiency, effectiveness and legitimacy.

The ideas and analysis in this document are based on the work of each of the authors at the interface of national and local policing over the past 15 or more years, the Police Foundation's Strategic Review of Policing in England and Wales¹, and informal conversations with leaders across policing and home affairs policy. The work has not been commissioned by anybody. We have written it because we think reform could deliver significant improvements in the service the police provide to the public.

An earlier version of this paper was shared privately with those leading national policing institutions and considering police reform in December 2023. We are sincerely grateful for the insightful comments and feedback received from these leaders and from those we have shared drafts of this paper (please see acknowledgements).

We now welcome further feedback from readers and hope that the paper will stimulate debate and discussion as the government moves forward with its police reform agenda.

2. The case for change

There is a clear case for greater (and more coherent) national policing action

Much of policing today is as local a profession as it ever was. Robberies and violence in public spaces, hidden harms taking place in homes across the country, theft affecting local retailers, public reassurance and victim care all require a local policing response. These harms can all, to some extent, be controlled through local activity by the police and their public sector and community partners. Community confidence in policing is still mainly shaped by local experiences and direct contact. And it remains the case that trust in local institutions and services in the UK is often higher than in national ones.²

There is no doubt, however, that effective policing also requires extensive national coordination and action. This need for national action is increasing due to:

- **The growing role of digital technology**, which has increased 'remote' and borderless criminality – for example in relation to fraud, online criminal exploitation, and computer misuse. Local forces alone are simply not able to tackle increasingly large volumes of internet enabled crime.
- **The long-present but much underestimated role of national and increasingly multi-national companies** in creating (or restricting) criminal opportunities - for example, vehicle manufacturers' work on car security, or social media company identity management and reporting policies. To prevent crime in the 21st century the UK requires national relationships with global corporations.
- **More extensive citizen exposure to national and global information** on crime and policing, with public views of policing increasingly shaped by non-local events, social media comment and video footage.
- **Changing public expectations for services**, including expectations of consistency, partly drive by customer experiences elsewhere.

These factors are in addition to other long-standing reasons for national action, including:

- **Efficiency:** when police forces face common problems or opportunities, it will often be more efficient to design solutions once at a national level, rather than many times locally – though attention needs to be paid to ensuring national action will 'work' in local environments. As a positive example, Single Online Home is clearly assisting public contact – albeit with different levels and speed of uptake. However, in most cases, digital, data and technology investment is still determined entirely locally, resulting in multiple procurement processes and creating myriad local systems that struggle to share essential data.
- **Effectiveness:** There are clear effectiveness gains, for example, from national analysis and sharing of data: on crime patterns, and offenders, on 'what works' in tackling crime, and on how to organise policing resources to best effect (as the recent Home Office-sponsored Productivity Review demonstrated) - even though local contextual qualifiers will always need to be taken into account. In areas of specialist

1 See https://www.police-foundation.org.uk/policingreview2022/wp-content/uploads/srpew_final_report.pdf

2 Association for Public Service Excellence (2022) <https://apse.org.uk/index.cfm/apse/news/articles/2022/despite-challenges-2022-survey-shows-continued-trust-in-local-councils-for-service-delivery/>

police work, there are benefits to be gained from concentrating expertise in ‘centres of excellence’ as opposed to dispersing it throughout the country. Indeed, the benefits of effectiveness in tackling serious and organised crime and counter-terrorism across a larger geographical scale are already reflected in the existence the National Crime Agency (NCA), the Counter Terrorism Command, and the network of regional organised crime units (ROCs).

- **Legitimacy:** when the public expect (or need) a consistent response, it can be helpful to ensure this through national standards or action. Given that confidence in policing is clearly shaped by national (and even international) media and events, policing would often benefit from a single policing voice on key issues.

Current approaches to national action are often ad hoc, undermining efficiency and effectiveness

In recognition of the need for national action, there have been several examples of recent national initiatives that have aimed to overcome the limitations or inefficiency of local-only solutions, including:

- Operation Talla, which drove a more coordinated and consistent Covid-19 policing response.
- The Police Uplift Programme, which supported the delivery of the 20,000 officer number increase and developed new pan-policing data sets that allow for more informed workforce planning.
- The National Violence Against Women and Girls (VAWG) strategy and Operation Soteria Bluestone, which is aiming to drive an improved policing response to rape and serious sexual offences.
- The Policing Productivity Review identified model processes that ought to be adopted by all forces where they can show there are more effective and efficient ways of doing things.
- New light-touch support from the College of Policing for forces in (or at risk of entering) HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) ‘Engaged’ status (policing’s equivalent of ‘special measures’).

- A very wide range of activities – ranging from research to guidance to ‘on-the-ground’ projects – led by Chairs of National Police Chiefs’ Council (NPCC) Coordinating Committees (e.g. for Performance Management, or Prevention), often undertaken with minimal dedicated funding or resource ‘borrowed’ from the force of the Chair or Committee members.

Each initiative has been helpful to some extent. Yet it is striking that each such initiative is much like a business ‘start-up’. Funding streams are often ad hoc and insecure. There is no consistency of governance. Teams supporting initiatives are ‘stood up’ and ‘stood down’, meaning there is little scope for learning and continuously improving the model for driving local improvement through national work. In short, there is no standard operating model for national improvement or the running of many ongoing critical national policing capabilities – and each initiative has therefore not been able to operate with optimal efficiency and effectiveness. Matters are not helped by the wider recent trend towards one-year funding settlements.

Nowhere is this gap better demonstrated – or known – than in relation to police technology. The Home Office has set a clear direction of travel for policing: that the NPCC should eventually take over from the Home Office the commissioning and assurance of national technology programmes. However, models of funding, the approach to effective commissioning, the governance of the ever-expanding Police Digital Service (the envisaged main delivery body), and many other issues are still being worked through. Approaches are, again, being developed in isolation – creating a risk that the model created will again add complexity, and not interact neatly with linked areas such as digital forensics, procurement or service improvement initiatives.

In the arena of serious and organised crime, we are also currently building core national capabilities in different places. Fraud data is held separately from money laundering and cybercrime data. The serious and organised crime picture is being assembled in a different place to the counter-terrorism picture. There is a clear need to move over time to joint capabilities, so the system adds up to more than (not less than) the sum of its parts and scarce resource is used to the greatest effect across the system.

Box 1. Areas that could benefit from greater national action

While this is not an exhaustive list, we set out below some of the main areas of policing capability that would benefit from greater and more coherent national action.

Areas of capability	Problems experienced with the current approach	Benefits of national action
Digital, data and technology	Forces adopting their own approaches, which prevents data sharing, inhibits the collection, interpretation and use of national data, makes it harder to engage coherently with major software and service suppliers and increases costs through overlap/duplication.	Greater interoperability via improved data sharing, more effective targeting of operational activity via a clearer national picture around crimes, offenders, locations etc., greater economies of scale through national procurement and appropriate ICT system and software convergence.
Human resources	Lack of workforce planning leading to skills gaps, disjointed local recruitment campaigns, significant variation in vetting standards.	Workforce planning on the basis of a proper skills audit and understanding of future trends, national recruitment campaigns that make a clear pitch as to what policing is about, much greater consistency in the delivery of vetting.
Professional practice and standards	Authorised professional practice which is inconsistently applied, depending on the area, producing significant variation in standards across policing; police forces continuing to act in ways that contradict the evidence base as to what works, is undermining public confidence.	Mandatory minimum professional standards in areas that meet three criteria: where the evidence base is clear, where the public expect consistency and where meeting the standards is critical for public confidence in policing as a whole.
Communication	Communication mainly the responsibility of local forces, where poor or inconsistent communication can damage the reputation of policing as a whole.	In areas that are critical for public confidence in policing as a whole, having a clearer national voice for policing could help deliver more consistent messages and improve public understanding of why the police do what they do. This is also relevant to consistency of communication more generally, for example to support crime prevention.
Fraud	Investigations delivered by local forces mainly, but not prioritised, resulting in little action. Victims have to navigate an extraordinarily bewildering landscape of bodies to access support.	A national body to lead on the investigation of fraud, which recognises that fraud is a both serious and organised and volume crime. A national support service for fraud victims to support them to navigate a complex system. This could be significantly funded via private sector subscription like the British Transport Police.
Forensics	A complex eco system of providers, lack of compliance with quality standards, fragmented delivery, under funding of research and development, risk of miscarriages of justice.	A national body that could deliver or commission on behalf of policing, provide a more coherent research and development function and work to achieving quality standards to improve reliability.

Box 2. A note on the regional/force structures debate

This paper does not discuss regional structures or force restructures. The main reason for this is pragmatism – the issues here are complex enough by themselves. But it is also because:

1. We see the need for national action and reorganisation irrespective of decisions about which policing functions are performed regionally versus locally.
2. Regional structures in the UK are largely administrative entities. In accountability terms, they are either creatures of the national (e.g. the regional structures of the prison and probation service) or they are creatures of the local (e.g. current local policing collaborations to administer both specialist operational functions and back-office policing activities more cost effectively).

We therefore believe that the critical question to resolve is when accountability and action should sit nationally versus locally – and consider the question of whether national or local institutions can and should enlist regional structures and support as an important but secondary design question. We do recognise that there is a need to ensure Regional Organised Crime Units (ROCU) are more protected from inconsistent, hand-to-mouth funding, that regional counter-terrorism, serious organised crime and other specialist capabilities become more coordinated and interoperable, and that back office collaborations become more resilient and effective – but do not propose specific solutions here.

3. Diagnosis of causes

We should reiterate that policing is in large part a local public service. It is vital that most police resources continue to be spent locally in tackling local crime, responding to emergencies, protecting the vulnerable and reassuring and building working relationships with the public. Public confidence and legitimacy requires policing to be rooted in communities and responsive to local priorities, as set by locally elected PCCs or Mayors. We are clear that local policing priorities should be set locally not nationally. However, there are major gaps in our system, that impact on the effective delivery of locally oriented policing, that only action at the national level can address.

There are three interlinked issues at the heart of the failure to take more effective and sustained national action on policing challenges.

First, there is the legal and constitutional framework. There are two aspects of this that have been an impediment to coherent national decision-making. There is the fact that each Chief Constable and Police and Crime Commissioner (PCC) exists as a ‘corporation sole’, a legal fixed point in the system of police governance.³ This means that none of them can be bound by the decisions of others and when it comes to national collaboration in areas such as air support and forensics, each of them can simply opt out of programmes agreed by a majority of their colleagues.

“The NPCC is a fragile arrangement that relies on voluntary agreements being made between Chief Constables and, often, PCCs. The absence of a more formal mechanism to make collective, binding, national decisions is detrimental to the public and a major omission in the fabric of the police service.

Chief Constables sometimes fail to reach timely national decisions because a few of them don’t agree. The individual reasoning of those who don’t agree may be perfectly sound; for example, they may believe that the decision wouldn’t suit the circumstances in their own force. But collectively, this argument doesn’t carry merit. Chief Constables should make decisions that will benefit the public as a whole, and they shouldn’t stand in the way of progress because of the situation in their local areas.”

Andy Cooke, State of Policing

There is also the common law concept of the operational independence of Chief Constables, which means that in making operational decisions the Chief Constable, in Lord Denning’s words, “*is not the servant of anyone, save the law itself*” (R. V Commissioner of the Police of the Metropolis, 1968).

We are clear that independence in the direction and control of officers is essential to prevent the police becoming creatures of politics. However, we believe the concept has been over-extended to mean that Chief Constables cannot be mandated to collaborate in areas like IT or procurement, where sensible decisions may require national mandation with little risk to the constitutional independence of the police.

Both of these issues need to be addressed by creating a clearer and binding system for making national decisions

³ Linked to this, responsibility for “the totality of policing” is in baked into the PCC role via the Policing Protocol

that impact across the service. A system that requires unanimity is clearly sub-optimal and means that change happens piecemeal or at the speed of the slowest traveller. Decisions that are right for a single force facing specific short-term pressures, can override the long-term national interest.

Second, and linked to the legal and constitutional position, is the tradition of the 'tripartite' system. This is essentially a way of sharing power between the three principal actors in the system of police governance: the Home Secretary, Police and Crime Commissioners and Chief Constables. Over time the relative power of the different parties has changed: for example, from the 1990s to 2010 the Home Secretary became the most powerful voice in the system, backed by various legislative changes. However, during the 2010s the Home Office 'stepped back', preferring to leave decision-making to Chief Constables and the newly created PCCs. From 2019 the Home Office has begun to 'lean in' more, setting national metrics around serious crime reduction and establishing a National Policing Board. Often, mechanisms for exerting influence are informal – as shown in the police response to the previous Home Secretary's statements demanding "all reasonable lines of enquiry" are followed up even for "less serious offences".⁴

In our view it is right that police governance continues to reflect this tripartite tradition so that we avoid excessive political control of the police and that we recognise both the national and the local interests in policing. However, we think there is value in reviewing how this system works nationally so that it is clearer who is responsible and accountable for which decisions.

Third, the politics of police funding has also got in the way of developing stronger national police institutions. There has long been a conflation in public debate between the number of police officers and the visibility and effectiveness of frontline policing. How visible and effective police officers are does not simply come down to numbers but depends critically on how well they are supported by operational and business support functions. This comes down at least as much, if not more, to the work of non-warranted

staff and investments in technology, estate, training and equipment. And public confidence and victim satisfaction is clearly driven in practice as much by the quality of public contact or forensic work to ensure justice is done, which is again typically driven by non-warranted staff. National work can clearly support greater efficiency and effectiveness in many of these enabling capabilities, but a focus on officer numbers (rather than true visibility, impact and confidence) has undermined the willingness to invest.

As a result of these factors, the 'centre' in policing has historically been weak and arguably got weaker after 2010. We have been left with a multitude of uncoordinated, overlapping bodies, few if any of whom have the power to drive change. The National Policing Improvement Agency (NPIA) (abolished after 2010) was one effort to resolve this and was reasonably well funded, but it lacked any powers to mandate. The College of Policing is much less well funded than the NPIA and also lacks formal powers, except in some highly circumscribed areas. The National Police Chiefs' Council (NPCC) was set up as a deliberately weaker version of the Association of Chief Police Officers (ACPO), which was deemed too powerful and insufficiently accountable before it was wound down. The NPCC plays an important coordinating role in the centre, but does not have a legal existence of its own, and therefore cannot be a robust organisational home for key national capabilities.⁵ The Association of Police and Crime Commissioners (APCC) is a voluntary membership body with limited resources and its role in the system has not been properly formalised, and must go annually to members to ask for subscriptions to sustain its existence. After 2010 the Home Office switched its focus to serious organised crime, terrorism and immigration and largely stepped back from setting a strategy for the policing system and extensively monitoring its performance. Since 2019, Home Secretaries have attempted to exert more influence again – but without the underpinning infrastructure to do so as effectively and strategically (see Box 3).

There are clear trade-offs to manage in addressing these issues and few perfect answers, but the core problem of a weak centre in policing remains.

4 See <https://www.gov.uk/government/publications/pursuing-all-reasonable-lines-of-enquiry-letter-to-police-leaders/pursuing-all-reasonable-lines-of-enquiry-letter-to-police-leaders>

5 It is worth noting that as a membership body, the NPCC also enables helpful collaboration and coordination across the UK and overseas territory – when otherwise mechanisms for collaboration across England and Wales, Scotland and Northern Ireland, and overseas territories are notably weak.

Box 3. The role of the Home Office

In 2010 the Home Office stepped back from extensive oversight of local policing, scrapping national performance targets, introducing elected Police and Crime Commissioners and handing much of its performance monitoring role to HMICFRS. Since 2019 Home Secretaries have started to 'lean in' more, for example:

- Setting national crime measures which forces are to focus on.
- Establishing the National Policing Board to provide greater grip on the system.
- Driving the Police Uplift Programme to secure 20,000 additional police officers.
- Injecting periodic highly persuasive 'asks' of the sector to focus on specific issues (e.g. shoplifting) or work in specific ways (e.g. pursuing all lines of inquiry).

It is clear that the new Home Secretary wants to see a much more active role for the Home Office in the system. The Home Office's role ought to be re-considered as part of the forthcoming police reform White Paper. In our view it should be the system steward, setting overall strategic objectives for policing and then providing the resources and designing the system to meet those objectives over the course of five to 10 years (we say more about this below). To carry out that role the Home Office needs greater capability to assess the performance of the system against the objectives it has set in the national interest. It should also be doing more to understand what good practice looks like and help to spread that learning.

In becoming more strategic, there are some activities that the Home Office should do less of, most notably the distribution of small grants to carry out politically favoured initiatives. Rather than being strategic this involves ministers and civil servants in the micro-management of local projects. We are not naïve. We know that ministers will sometimes want to sponsor particular pieces of work and be associated with them. But the main focus of Home Office activity should be strategic and focused on the whole system.

4. Potential solutions

1. Clearer central direction setting and system design by the Home Office

In our view there could be a beneficial active role for the Home Office in our policing system, but this should not be about interfering in local policing, still less operational decision making, rather it should be about system stewardship. By this we mean setting an overall direction for the system, by means of establishing some long-term outcomes and providing policing with the mix of funding, institutions and incentives to achieve those outcomes.

In summary the Home Office as system steward ought to:

- **Set a small number of long-term priorities that will provide a strategic anchor over the course of a parliament** (e.g. a set of five to 10 priority outcomes reflecting national priorities). These should be linked to the cross departmental missions the government has set and would partly focus on the way policing will contribute to those missions, particularly the Safer Streets Mission. It is critical that these are framed in terms of measurable outcomes (e.g. public confidence or victim satisfaction) which are less vulnerable to gaming – even if shifts in outcomes will often be harder to attribute solely to police action. A set of national priority outcomes should be accompanied by local priority outcomes

set by the local Mayor or PCC. To prevent rigidity, there could be space within the outcome set for one or two outcomes that could change every six months, providing ministers with the flexibility to respond to events and recent trends. Overall, this framework will provide policing with something it has lacked in recent years: a clear sense of mission and the confidence that this will be sustained over a parliament, rather than seeing priorities switched every time there is a cabinet reshuffle.

- **Put in place the right mix of institutions, support and incentives to achieve those priorities.** This would take the form of a piece of legislation, following the expected White Paper, to reform the institutional landscape along the lines articulated below, with the aim of crafting a system that is locally responsive and embraces variation and innovation, but does so on the basis of some clear minimum standards and the provision of a much stronger national enabling infrastructure.
- **Provide support for the tripartite system** nationally to ensure a balance of power between the police and politicians and the local and national levels. This could take the form of clarifying the role of the National Policing Board, reviewing its membership and supporting the APCC to play a full and proper role in the system by putting it on a statutory footing. The funding of each of the tripartite actors might also be reviewed to ensure each body

has the skills and capabilities required to play a role in strategic decision making. In many cases, it will be possible for analysis (for example, around what performance is possible at different levels of investment) to be conducted once on behalf of all – but even when this is the case all parties will need to be able to assess the quality of analysis and implications of different decisions to provide assurance to their constituencies.

- **Develop a more formalised budget and objective setting process**, that includes:
 - a. Multi-year budgets, wherever possible⁶
 - b. An evidence-based specification of minimum standards and performance expectations
 - c. Clarity on institutional roles, responsibilities and budgets
 - d. Assurance that performance and resilience objectives can be met given budget decisions.

We are not currently clear whether putting in place the critical national capabilities outlined in the paper will require additional investment (or just significant reconfiguration of existing investments, which can be duplicated and inefficient). However, we do envisage that at a minimum funding will need to be reconfigured: funding of national capabilities should be direct, rather than first delegated to Police and Crime Commissioners and then requested back, which would entail a greater proportion of the current national policing grant being ‘top sliced’ or reserved for national policing activities.

Next steps to test and strengthen this

recommended direction: if not yet conducted, analysis may be required to identify ‘as is’ expenditures on national capabilities and whether this funding can simply be reconfigured to start building the coordinated national capabilities policing requires – or whether additional funding is required.

2. A robust system for national decision-making

The current institutional arrangements do not provide an effective basis for national decision-making. There is no way of binding the 86 corporations sole behind majority decisions. Decisions on whether to collaborate in areas like technology, forensics or air support require

unanimity or can only proceed with a partial group of willing parties which undermines the effectiveness of national solutions.

There are three ways of making binding national decisions. The first is for the Home Secretary to use her powers to require police forces to collaborate in specified areas or to use her control of funding to directly commission national solutions. This would not require wider agreement. So, for example, rather than ask PCCs and Chiefs to agree to pool their local funding to establish a national solution, the Home Secretary could simply decide to fund such a solution directly and correspondingly reduce the local grant to do so.

The second is to establish a proper decision-making mechanism, by means of a binding agreement between all parties, as was previously advocated by then HM Chief Inspector of Constabulary Sir Tom Winsor. Such a system would be required within both the NPCC and the APCC and would enable them to take decisions on national action in the absence of ministerial intervention. This would likely involve a system of majority or qualified majority voting. For operational matters the NPCC would be the relevant decision maker but for financial matters APCC authorisation would also be required. In our view it is preferable for the system to take such decisions itself without having to rely on political intervention, which historically ministers have been reluctant to undertake.

If ministers are clear that a national solution is in the national interest and the NPCC and the APCC cannot agree to move forward, they could then use the Home Secretary’s powers as above. If this is required, it may be helpful to put in place a protocol for escalation of decisions that policing is unable to agree collectively.

A third possibility would be to empower the head of the National Police Agency we propose below with the powers to move ahead with decisions and mandate compliance, subject to a clear process of consultation with the tripartite actors. However, we believe that full tripartite governance would support greater system wide ‘buy in’ to decisions and so for this reason prefer a stronger collective decision-making system. Blended models are certainly possible.

Next steps to test and strengthen this recommended

direction: develop decision-making and voting mechanism options, considering questions such as the role of the non-territorial police forces, the issues which would require only operational (versus PCC, Home Office and operational) input, and how decisions will be enforced.

⁶ We recognise that the ability to set multi-year budgets will depend on factors beyond the direct control of the Home Office, and macro-economic factors

3. A revised national landscape that addresses key gaps and builds lasting capabilities to drive lower crime, higher public confidence and improved efficiency

We propose the creation of a new National Police Agency which:

- **Brings together the oversight or running of all key national operational support institutions/ functions** – including air services, national forensics capabilities, and management of grant-in-aid systems (currently managed by the National Police Coordination Centre, NPoCC). This organisation could also house national crime prevention capabilities and take on functions, such as the National Business Crime Centre.⁷
- **Oversees all key national enabling services**, either directly providing or commissioning key national support functions for policing. The National Police Agency's core enabling functions would be digital, data and technology (including vital police research and development work, currently being promoted by the Chief Scientific Advisor, Paul Taylor), people and workforce planning, and finance and procurement. We note that the National Police Agency would have ownership of 'make or buy' decisions and would choose where separate organisations such as the Police Digital Service (PDS) and BlueLight Commercial are preferable (due to their specialist focus and/or flexibility) versus in-house delivery.
- **Provides professionalised operational leadership** for national progress on key crime priorities within the Safer Streets mission (possibly split into themes like VAWG, other serious violence, fraud and cyber, neighbourhood crime and antisocial behaviour).⁸ The current temporary or part-time NPCC leads with no meaningful professional support would thus be replaced by between one and half a dozen full-time senior national policing leaders to enable and drive change. Dedicated leads would be able to speak nationally on relevant operational issues below ministerial level and drive creation and uptake of standards, training and technology

⁷ An argument could be made that crime prevention capabilities - relying as they do on influencing business regulation, relationships with multinational corporations and work across the government with departments such as the Department for Levelling Up, Housing and Communities and Ministry of Justice, might benefit from sitting within the Home Office itself.

⁸ Prevention, response and investigation leads may also be needed to avoid excessive crime type silos, and major gaps, e.g. around child sexual exploitation will also need to be avoided.

innovation (most likely with a small expert staff team empowered to lever in the wider resources of the broader Agency). NPCC Committees would largely become advisory committees to these professionalised functions (though lower priority issues would likely still be supported by voluntary efforts/ networks across policing). The Home Office, as now, would have its own policy leads on similar or linked crime outcomes – allowing them to drive policy coordination and cross government action and working closely with professional leads to segment work and play to strengths.

- **Provides a strong strategy and planning capability for policing.** As part of this, it will be particularly vital to have a robust costing and benefits assessment capability. Where any significant national strategy, standard or policy is developed, it must be accompanied by a clear statement of the time and cost implications for local policing, national and local partners and the public. This will mitigate the risk of central agencies imposing uncoded burdens on the frontline, as is unfortunately common in the present system.

There are many nuances and potential permutations, but we see four main options for this body which we set out below.

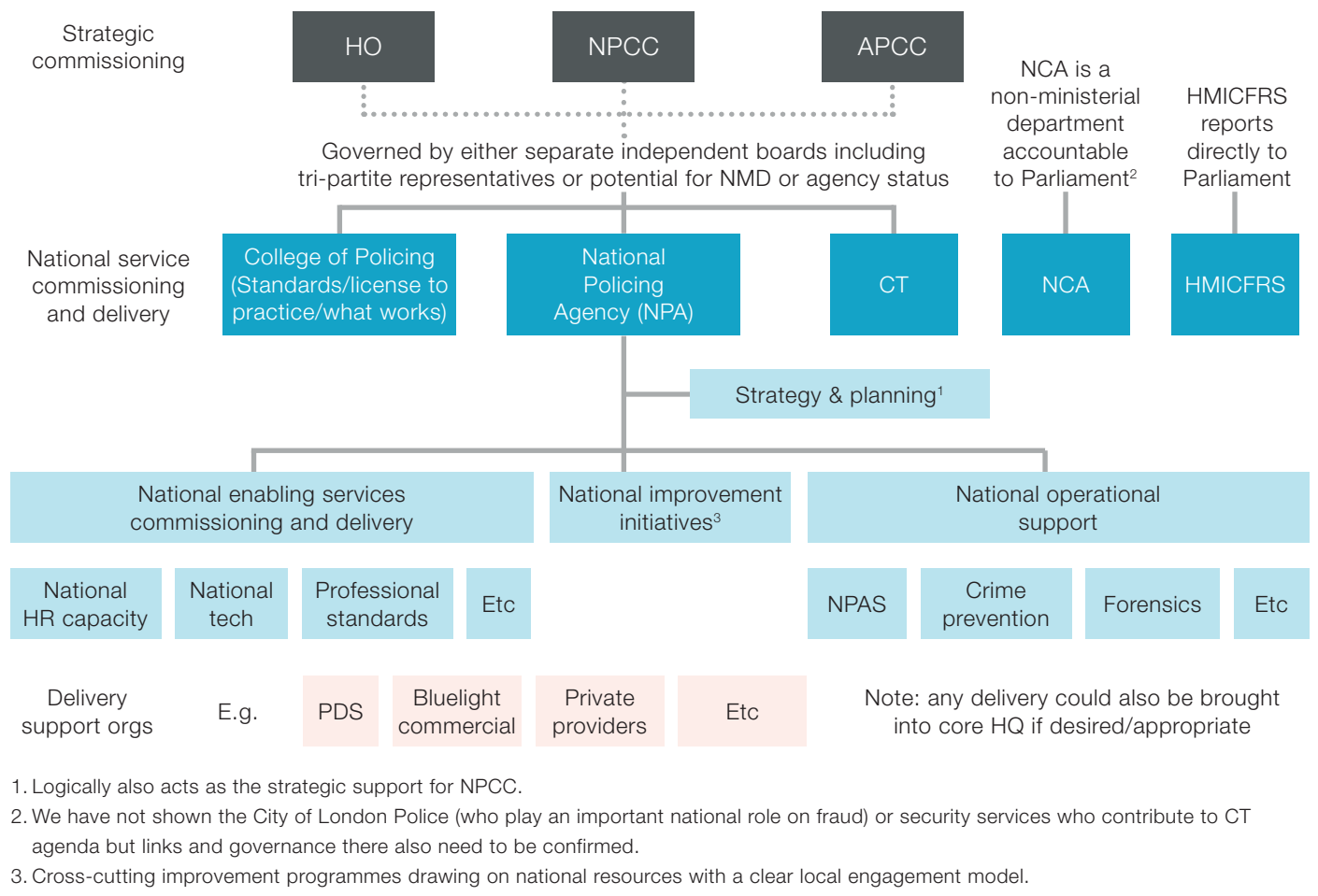
We are currently unclear on whether the National Police Agency should house major operational delivery capabilities. For example, the Agency could also house or commission a national fraud policing solution (combining Action Fraud, investigations and victim support) – though, as a larger operational policing capability, this may need to remain separate for the time being and there is also a case for hosting it within the NCA. It might also – in its most expansive form – house counter-terrorism policing, the NCA and policing's wider serious and organised crime capabilities. We discuss the pros and cons of this further below.

The National Police Agency could sit alongside a streamlined College of Policing, which would continue to act as an independent body setting professional standards, the educational framework and developing professional knowledge and evidence (Option 1 below). This would follow the structure in medicine where independent Royal Colleges act as custodians of professional standards. This model has its advantages: the profession itself develops its knowledge base autonomously, sets professional standards and (potentially) licenses practitioners, autonomously of

the government and of the operational leadership. Professional standards and training requirements are therefore set by those whose only interest is high standards of professional practice. If we were to choose this option, it might then make sense for the College to become more independent of the government by pursuing a full Royal College model (Option 2 below). The main barrier to this is the requirement for self-financing (i.e. professional bodies maintain independence because they are funded via – effectively mandatory – professional subscriptions). This could be overcome if the Home Office uplifted police pay by the total amount required to fund College activities and required officers – and potentially staff – to subscribe to maintain their licence to practise.⁹

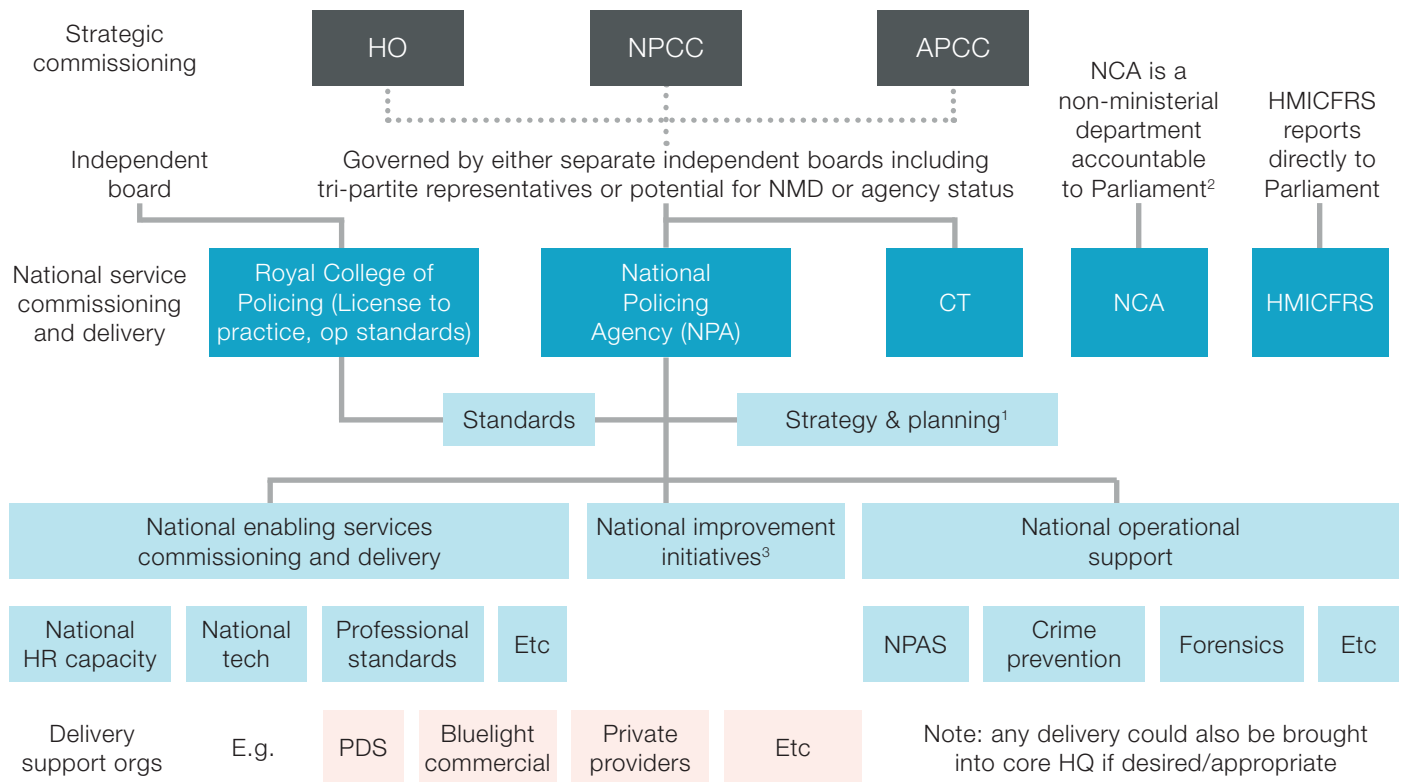
Alternatively, the College of Policing could be rolled into the National Police Agency (Option 3), which would have the advantage of reducing areas of duplication and overlap between the otherwise separate entities and would avoid the confusion which can arise in the current system of different entities pursuing conflicting objectives or having different policy positions. This would also simplify the landscape and reduce costs. We believe that there are significant benefits from having a single pre-eminent agency setting strategy, supporting operational effectiveness and speaking for policing as a whole.

Option 1: Retain core of existing system but bring together national enabling and operation support



⁹ This approach would mean no net additional costs to taxpayers, or officers and staff

Option 2: Consolidate and set up a truly independent professional body in line with Royal College model

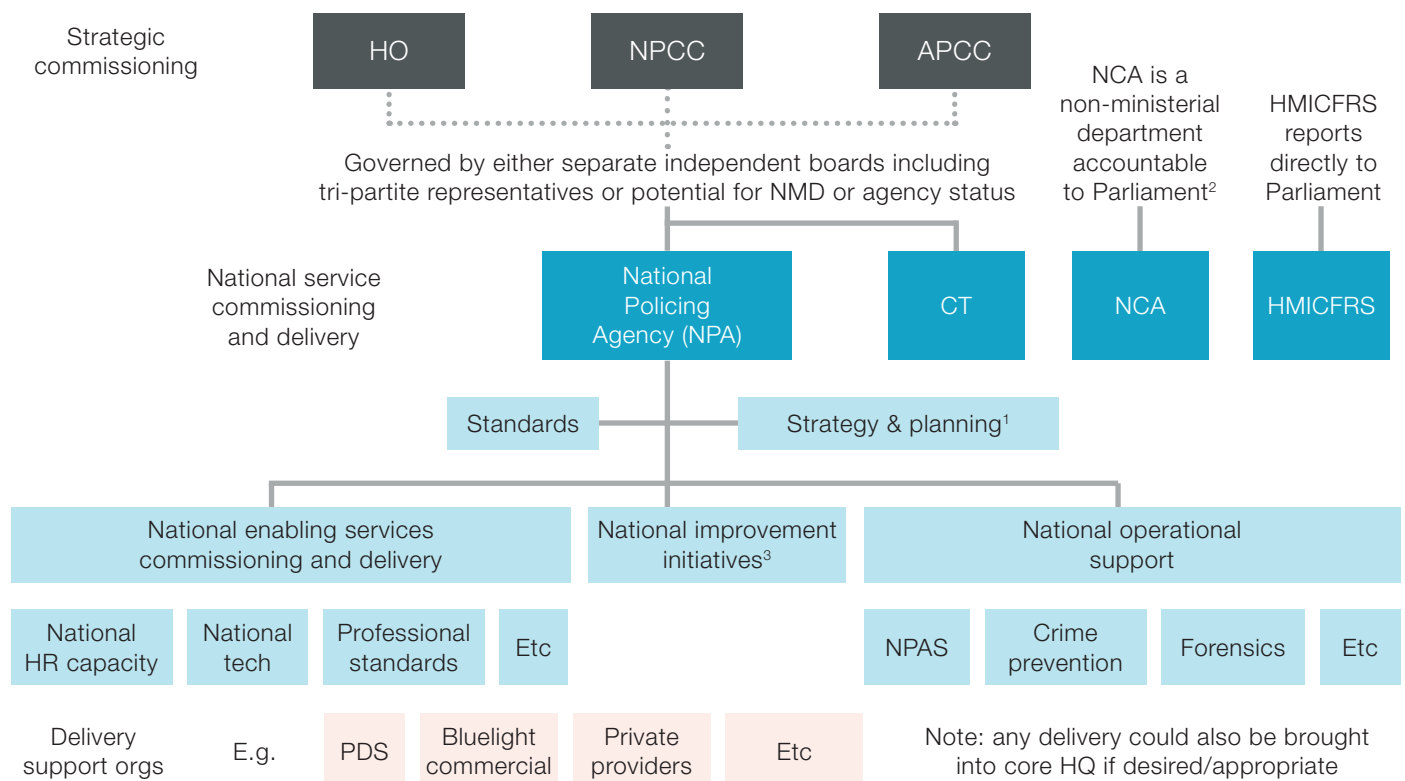


1. Logically also acts as the strategic support for NPCC.

2. We have not shown the City of London Police (who play an important national role on fraud) or security services who contribute to CT agenda but links and governance there also need to be confirmed.

3. Cross-cutting improvement programmes drawing on national resources with a clear local engagement model.

Option 3: Further consolidate

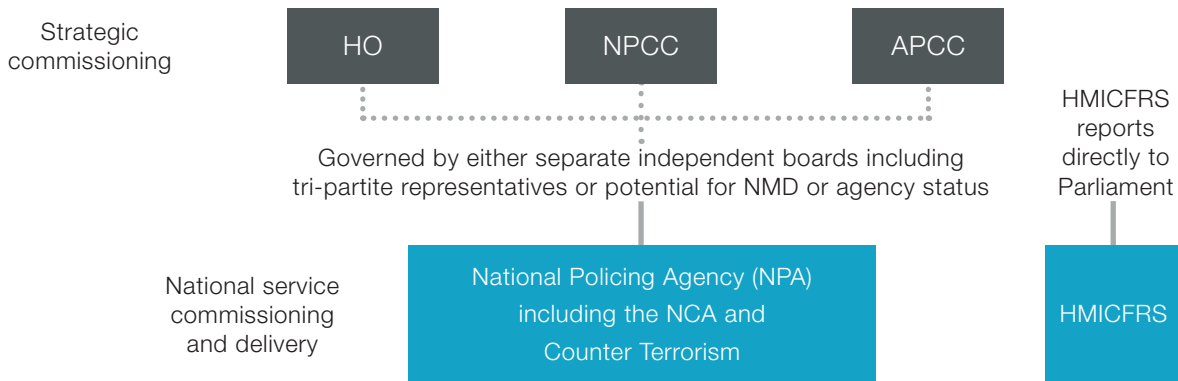


1. Logically also acts as the strategic support for NPCC.

2. We have not shown the City of London Police (who play an important national role on fraud) or security services who contribute to CT agenda but links and governance there also need to be confirmed.

3. Cross-cutting improvement programmes drawing on national resources with a clear local engagement model.

Option 4: Maximum consolidation



The fourth, and maximalist, option would be to fold the two big operational delivery bodies (counter-terrorism policing and the NCA) into the National Policing Agency (Option 4). This would have the following advantages:

- It would build interoperability between the counter terrorism space and the serious and organised crime space, which would bring significant operational benefits given the overlap between criminality in these spaces.
- It would create a much simpler national landscape, with benefits in terms of strategic clarity, whole system coordination and reduced costs.
- It would resolve the accountability problem within the Metropolitan Police of having to be both accountable to the Home Secretary (because of its national functions) and to the Mayor of London, and would enable the Met to focus on policing London with national capabilities held elsewhere.

There are some disadvantages, however. The biggest of these is that the implementation of such a ‘big bang’ approach would be very challenging and comes with the risk of operational disruption. There is also a concern about whether the focus on one body would be too broad, resulting in a lack of focus on important matters such as police technology and training.

In our view, the government could not create the Option 4 model quickly and it would be better to adopt one of Options 1-3 in the short term. In relation to counter-terrorism and serious and organised crime the government should in this parliament a. find immediate wins from sharing resources between counter-terrorism and the NCA regionally and nationally; b. assess all options on serious and organised crime accountability structures and c. consider potential to join up capabilities nationally, and where structural

solutions including mergers are strictly necessary. An alternative which merits attention is the idea of bringing counter-terrorism, serious and organised crime and fraud together in a joint crime fighting organisation that sits alongside the National Police Agency. We see no reason to delay further work to share resources between counter-terrorism policing and serious and organised crime policing at the regional and national level.

We note that neither the College nor the NPCC are yet equipped to perform the functions envisaged for the National Police Agency – and there are a range of ways of conceiving of the set-up of the new institution (start-up, merger, or College/NPCC take-over).¹⁰ In addition, there are questions of legal status and funding models. National policing entities with operational responsibilities – for example, the NCA and the Serious Fraud Office – have typically been set up as non-ministerial departments.¹¹ We also need to be clear that the National Police Agency should be a significant executive body, not simply a governance structure, and should have a dedicated Chief Executive. This Chief Executive could be accountable to a board made up of the tripartite actors (ministers, Chair of the NPCC, Chair of the APCC). We also see an opportunity for significantly more public and partnership input within the governance structure – given the role of partners in achieving violence reduction and other national priorities.

¹⁰ In practice, the quickest route will be to build out of the existing College entity and structure – with early clarity on the extent of change required to achieve the target state for the new body, and ensure strong performance and brand.

¹¹ There is significant debate about whether this status in any way interferes with operational independence due to funding dependence – but there is limited evidence of there being genuine political interference risk. Some form of local and national funding mix may be desirable - though this will be difficult to achieve practically.

For all national functions, there will need to be much greater clarity on what precisely is done nationally versus locally, including work carried out regionally on behalf of national or local policing bodies. Annex 1 provides a framework for the key roles that need to be defined clearly for all institutions across the system: setting objectives, funding and direction; setting policy and standards; commissioning; delivery; and coordination. Overall policing governance will need to be refreshed, with clarity on how a refreshed national policing board can govern key decisions on funding and institutional set up and ensure effective ongoing system stewardship. It is essential here to achieve clarity on the role of overall national policing governance and the role of separate governance arrangements of individual national organisations.

Next steps to test and strengthen this recommended direction: develop the next level of detail on options and national structures, focusing on roles and responsibilities and accountability and decision-making mechanisms.

4. A better politics for policing

While police officers would undoubtedly have a significant role to play in enhanced national capabilities, many specialist capabilities – for example, around fraud investigations, technology or crime prevention – also require different (and often interdisciplinary) skills. For specialist policing functions to be appropriately resourced, there is a need to move the political debate away from arguments about officer numbers.

Arbitrary targets around the number of officers are not helpful either locally or nationally – and are already having vastly perverse consequences. A majority of forces are now putting officers into roles in force control rooms that were previously performed more cheaply (and sometimes better) by non-warranted staff. There are significant shortages of digital investigation and forensics capability that cause delays in justice.

The current government has already committed to increase *neighbourhood* officers. The initial neighbourhood policing pledge involved a commitment to 13,000 new officers in neighbourhoods, including hiring 3,000 new officers and 4,000 PCSOs. We believe it is sensible to maintain this commitment to rebuild neighbourhood policing, provided there is strong focus on the precise work these roles perform to best reduce crime and increase community confidence. However, given fiscal pressure, interpreting this as a commitment to an overall increase in officer numbers, rather than a

neighbourhood specific pledge, seems unnecessary and unhelpful.

Over time, we believe we need to develop an alternative currency to officer numbers, either to:

- Focus more broadly on ‘police personnel’, recognising the important contribution of all officers and staff.
- Focus on a new category of ‘crime fighters’ – defined broadly to encompass all officers and staff, or more narrowly to include a subset of clearly operational roles that excludes the ‘back office’ that the public (rightly or wrongly) are less eager to fund.

The argument is not impossible to make to the public; the media can be educated on the reasons for this articulation and messaging can be regularly reinforced by ministers and officials.

There may also be potential to anticipate the critiques of new national capabilities and institutions: for example, by defining and capturing the benefits delivered by these organisations – for example, in terms of crimes prevented and frontline policing hours saved.

Next steps to test and strengthen this recommended direction: confirm publicly the commitment is to *neighbourhood policing numbers, if feasible, and* - if there is political appetite - develop a draft action plan for steps that would enable a new more sensible dialogue around police resourcing focused on capabilities not officer numbers.

5. Strengthened systems of transparency and accountability

An effective system requires transparency and accountability. While there are not enormous gaps in the existing system, we suggest the potential for the system to examine – and find ways of improving - the connections and feedback loops between central direction setting, inspection, Independent Office for Police Conduct findings, and PCC accountability processes. This might include clarifying the responsibilities of PCCs in scrutinising Areas for Improvement and Causes of Concern identified by HMICFRS, developing understanding across the system of what ‘good’ performance in different areas looks like (and how area demographics and demand profiles impact performance), and articulating how work by the policing ‘What Works’ centre or Centre for Police Productivity (both now sitting in the College) feed into what is inspected and how judgements are formed. There is, in our view, also a strong case for a more

meaningful ‘failure regime’, which provides more hands-on support to forces judged by HMICFRS to require intervention. These exist in service areas such as health or local government,

6. Barriers and challenges for implementation

We identify a number of factors that might militate against implementing the above recommendations and which need to be overcome.

- **Funding and optics.** There is a clear investment case for building a more coherent and effective national policing landscape. However, bolstering national institutional funding may be seen as being at the expense of greater local policing investment. It risks therefore being unpopular across key stakeholders and difficult to defend to the public – unless the operational benefits are made compelling.
- **Implementation costs.** Transitioning any functions to the national tier or across institutions (as being demonstrated by the current transfer of ICT functions out of the Home Office) requires careful implementation. Change quickly becomes mired in the costs and practicalities of HR issues such as TUPE (Transfer of Undertakings Protection of Employment rights), as well as niche ICT, finance and legal issues best known to those who have run transfer of functions projects previously. The big costs to keep an eye on relate to possible equal pay requirements and claims – though these should only affect officials and police staff, not warranted officers. Other costs are usually ‘one off’ and can be defined and managed proportionately.
- **Implementation disruption.** Any major institutional change carries a period of disruption as people set up new (or refreshed) organisational infrastructure and get to grips with new roles. Disruption can be minimised with effective planning and clear leadership – but particular care may need to be taken around critical delivery projects to insulate them from change disruption.

There are potential approaches to design and communication of a stronger national policing system that mitigate each challenge area. A National Police Agency that foregrounds that it deals with vital operational support functions like air support is likely to be better placed to secure political support and funding than one that emphasises the (equally vital) enhancement of technology, national-level workforce planning and executive development. A proper business case process for a new model will flush out HR implications, costs and risk mitigation.

A business case should also consider how to phase implementation. One approach might involve establishing a basic, minimalist national capability for core functions before then looking on a case-by-case basis at the right balance of central and local policy and activity. For example, a national professional standards capability might be established to coordinate and support force level efforts on vetting – but a project could be scheduled to look at the potential for national (or regional) vetting solutions.

Whatever the model, it is important to manage the change – considering known critical success factors for previous public sector reform programmes.¹²

7. The imperative to act

Making change is in our view central to achieving the Government’s Safer Streets Mission. It will quite simply be impossible to make financial efficiencies of the scale required without a more coordinated national approach to police procurement and police technology. Progress on key crime types such as VAWG will be too slow without a clearer national steer towards effective practice. And a roll-out of improved neighbourhood policing risks repeating failures of the past if forces are not actively directed towards effective practice and real-world impact on crime and confidence are not monitored.

We welcome debate about the best approaches to change, but change is clearly vital.

¹² See A, Mullins and M. Sole, *Leapwise Victory Framework for Major Change*, July 2024.

Annex 1: Q & A

Is this just centralisation that will inhibit local autonomy?

Most policing will continue to be locally funded, governed and delivered. The national functions brigaded together above are mainly those that are already provided, just ineffectively and in a fragmented manner, through the existing landscape. And there are some things that are better delivered nationally, such as digital forensics and the development of certain new technologies.

We consider the risks of an ‘over-mighty’ or ‘out of touch’ centre to be genuine, however. This has therefore significantly informed our view of the need for a voting system to support standard setting decisions, and the need for a strong costing and feasibility capability in the National Police Agency (which does not currently exist for policing). Voting creates a transparent check and balance to mitigate decisions from the centre that do not sufficiently reflect implementation practicalities or local community concerns. The Home Secretary would retain override powers as now, and a majority or qualified majority voting system can provide her with transparency on levels of support or opposition to change.

There may also be concern that the proposed National Police Agency model would create a large quango – but we see it is infinitely preferable to have a coherent and strategically focused body at the centre than a plethora of poorly coordinated and inconsistently commissioned bodies as at present.

How much will this cost?

We have not undertaken a costing analysis, but costing does need to be done for different options as part of a proper business case process. We note that there are significant national and local investments in many of the functions the new Agency would house already – and know of several areas of duplication and inefficiency (e.g. in relation to data standards and exploitation). However, we simply don’t know whether addressing fragmentation and duplication provides sufficient funding to invest in a truly capable and fit for purpose centre. **Preparatory work on the ‘as is’ spending picture needs to be undertaken with urgency.** And it should also consider the question of the condition of infrastructure being transferred to new or strengthened central policing structures (e.g. technical debt due to underinvestment in certain ICT systems, or liabilities relating to physical assets, if applicable).

How much delivery disruption would the creation of a new Agency create?

Any disruption would not be at the coalface of operational policing (unless SOC and CT structures were in scope) and in practice we doubt that forces would be disrupted in any meaningful way by changes. However, we should be realistic that changes may marginally affect the attention of national enabling capabilities for a period of time (e.g. by creating uncertainty for leadership teams across the currently fragmented institutions in this terrain, and due to time working through practicalities of changes to structure, process and personnel). We have highlighted ways to minimise disruption. These include:

- Creating the Agency out of an existing entity such as the College (which overcomes significant legal entity and administration challenges).
- Initially leaving many of the smaller institutions or units unchanged, with the Agency simply commissioning the services of the PDS or Bluelight Commercial, for example, either through a unchanged/as planned block grant or another straightforward mechanism. We note that the set-up plan absolutely must include a sequenced programme of change over three to five years to capture the full benefits of the shift to a single commissioner and look at cross-functional efficiencies that can be gained over time.
- Early planning as far as is possible within the confines of the electoral cycle, including through clear documentation of the ‘as is’ delivery landscape.

What might this mean for the current NPCC coordinating committees?

The current model of NPCC Coordinating Committees is largely insufficiently supported to drive serious improvement and change across UK policing. However, the concept of drawing on expertise across the sector, and having mechanisms to secure a range of professional input, does have significant value. It provides a mechanism for building shared understanding of different approaches in operation across forces, providing rapid feedback into topical debates and urgent national decisions and doing the preparatory work that is required for major NPCC policy and standard setting discussions/decisions. We propose that there would in future be dedicated professional leadership for key domains and decisions within the National Police Agency,

and professional full-time support. However, dedicated national leads would draw on Committees (now Advisory Committees) to inform the work throughout. In other words, Advisory Committees would shape rather than drive work getting done, better reflecting the level of work it is feasible for chief officers to do alongside busy day jobs. This approach also provides strong assurance and accountability for national leads – and Advisory Committees would naturally be a key advisory input into the National Police Chiefs’ Council on the adoption of new standards, sign off of key investments, and input into policy positions/media positions.

Couldn’t/shouldn’t the Home Office do much of this national work?

We envisage a system in which the Home Office determines the ‘what’, and the National Police Agency works out much of the ‘how’. The National Police Agency will provide functions such as training, technology and operational support that technically should be delivered by police professionals not civil servants. The Home Office arguably needs to play a greater role in certain areas, including driving cross-government policy coordination (across criminal justice and public safety systems), and recent shifts towards clarity of performance expectations will need to be maintained. As noted above, there is a need to think through the future Home Office role and capabilities in parallel to the establishment of National Police Agency capabilities – including detailed decisions, such as how shared data and performance capabilities should be designed and built to ensure the Home Office can play its important oversight and accountability role.

Won’t the National Police Agency undermine the College’s brand and the professionalisation agenda?

We provide options that could bolster the professionalism agenda, building a more independent and separate Royal College model for policing. We do feel, however, that the brand of a ‘College’ is less suited to the functions we envisage for the National Police Agency: i.e. its remit is far beyond professional standards, training and development. In practical terms, the Agency might be built out of the College.

The NPCC represents UK and overseas territories at present: how would this work in future?

There are a range of ways through which Scotland, Northern Ireland and overseas territories may wish to benefit from or formally purchase/call off National Police Agency services, if desired. Our assumption is that the British Transport Police, Civil Nuclear Constabulary and Ministry of Defence Police would have a similar relationship to the National Police Agency as English and Welsh forces, though some special provisions linked to their unique governance arrangements could be required.

Annex 2: National-local roles and functions

There are many functions that can be carried out either (or both) nationally or locally, and governance and institutional design need to be clear on where these key functions sit. Key functions include:

- **Setting objectives, funding and direction:** the Home Office currently uses a range of mechanisms to direct policing focus, including the Strategic Policing Requirement (which since 2012 has identified national threats and issues local forces must have due regard to) and a 'national outcomes framework'. The primary direction setting mechanisms for policing remain local, however, with PCCs setting strategic direction and force-level performance management regimes driving focus across key functions. The question of direction-setting should never be separated from funding: the critical questions for policing are 'what should the service focus on and achieve given available resources?' and 'what funding is needed to achieve a given set of goals?'
- **Setting policy and standards:** the job of setting the standards for operational policing (how to conduct particular policing operations, use key tools and tactics etc.) has moved around in recent decades – from the Home Office to ACPO - and currently sits largely with the College of Policing. The best known standard setting instrument is Authorised Professional Practice (or APP) designation. There are numerous APPs currently overseen and periodically updated by the College and these form the backdrop to policing curricula and training. Compliance with these standards varies, given that operationally independent Chief Constables remain free to diverge from them. Standards are also set – to a lesser degree – in non-operational domains, but compliance is taken for granted even less than with APP. For example, the Police Digital Service has compiled sets of data standards and common terminology – but policing is a long way off from having a robust data dictionary and architecture as a backbone for improved intelligence, better information sharing, and greater interoperability and efficiency of core policing systems. We note that wherever national policy making or standard setting roles sit, there is also a linked responsibility around communication – whereby policy setters also act as the 'voice of the service', explaining policy rationale to the public and adapting to public pressures.
- **Commissioning:** Commissioning in this context means ensuring that a particular service is delivered – either through direct delivery or some form of contracting (public, private or non-profit, as desired). Commissioning organisations retain ultimate accountability for solutions over the long-term (though providers should also be held to account, whether public or private). Commissioning requires a different (and specialist) set of skills and capacity from direct delivery – relating to specifying service requirements, incentivising performance and commercial capabilities. The decision on whether to commission delivery or deliver oneself should be based on an assessment of where delivery capability best sits and of the [ease of writing complete contracts](#) for service provision and holding delivery bodies to account.
- **Delivery:** Much policing activity is delivered locally but there are already a wide range of national delivery functions – including operational delivery of some policing activities (e.g. the NCA serious and organised crime activities), operational support services (e.g. the National Police Air Service) and delivery of enabling, that is non-operational, support capabilities (e.g. delivery of executive leadership development via the College of Policing's Executive Leaders Programme). We note that in some cases there is national commissioning of local delivery (that in effect already happens through various Home Office ring-fenced grant initiatives), and local commissioning of national delivery (as for specific national technology solutions such as the National Management Centre).
- **Coordination:** This slightly amorphous concept covers various types of activity but in particular a. less formalised knowledge capture and information sharing (e.g. around effective practice that is not more formally codified in APPs) and b. informal instigation – e.g. suggestions of action that people can ignore if they wish to.

Authors



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