

## Report

12

Report to: Executive Committee

Date of Meeting: 11 May 2011
Report by: Chief Executive

Subject: Submission to Scottish Government on the Future of

**Policing in Scotland** 

## 1. Purpose of Report

1.1. The purpose of the report is to:-

◆ Consider a proposed response to the Scottish Government's Consultation on the Future of Policing in Scotland.

### 2. Recommendation(s)

- 2.1. The Executive Committee is asked to approve the following recommendation(s): -
  - (1) Approve the submission (contained in Appendix 1) to go to the Scottish Government on this consultation.

## 3. Background

- 3.1. On 11 February, the Scottish Government announced the launch of a consultation on the future of policing in Scotland. This followed on from preparatory work undertaken under the auspices of the Scottish Policing Board. This had considered plans for efficiencies to meet the challenge of spending reductions in the years ahead and to improve information on policing costs and agreed that options for structural reform should be considered
- 3.2. In the consultation documents, stated that significant arguments had been made in favour of a single national police force for Scotland. With this being seen as likely to provide the greatest flexibility to deploy resources to provide all communities with equal access to specialist policing and to ensure better responses to national threats. It recognised there were questions over accountability and centralisation. It also recognised arguments for a regional policing model with fewer police forces but stated that there were uncertainties over whether this would result in significant savings, service improvements and improved accountability. Retaining the existing structure but with greater collaboration was seen as unlikely to deliver the savings necessary or service enhancements required to meet 21<sup>st</sup> Century challenges.
- 3.3. The Consultation paper looks at the current context/future challenges for policing, accountability and the options for structural reform. Responses to the consultation are required by 5 May 2011 to provide the basis for informed and evidence based decision making by the next Scottish Government.

- 3.4. The Sustainable Policing Project, undertaken on behalf of the Scottish Policing Board, created a Target Operating Model for policing built up from a review of the critical operational and supporting functions of policing. This model was then overlaid on the three structures to capture the extent to which the model could deliver these functions, effectively and efficiently.
- 3.5. Its conclusion was that the single force structure effectively mirrors its Target Operating Model for policing in Scotland. For the regional force model, it believes that it could deliver its target model but with more complexities. It should be pointed out that in the national, single force structure, the need for sub-national centres/ delivery is identified for 5 out of 10 functions.
- 3.6. It has determined that moving to its Target Operating Model in a single national force structure could deliver savings of £154mn per annum but would incur investment costs of £92mn to achieve this. However, it believes that some of these costs would be incurred anyway. Overall up to £120.5mn of these savings would come from staff budgets £51.8mn from the uniformed side and £68.7mn from support staff. This does not take into account any political commitments being made to retain a headline number of police officers. Points have also been raised recently on whether a national service would be VAT exempt as the regional forces presently are.
- 3.7. The report also states that in any changeover, the public can expect to see a fall in the delivery of policing they receive. It states that changing structures will not in itself drive efficiency or effectiveness within policing. Critical to the success of any structure is how the delivery functions of policing are organised and operate within the structure.
- 3.8. It sees local policing as paramount and that the most important public and partnership relationships are at Local Authority level and below, and need to be reflected in the structures and delegated authorities of local policing.
- 3.9. The project has assessed each of the policing structure options against 7 criteria, including sustainability. On sustainability, it considers that the 8-force option is not financially sustainable in the medium term. The single national force is seen as providing the highest potential for long term financial sustainability. The regional force option is seen as providing long term financial sustainability but with some risks to operational sustainability.
- 3.10. Though outwith their remit, the project has raised a number of questions that they believe need to be fully explored around local accountability, the need to mitigate against centralisation and the need to balance operational independence with public accountability.
- 3.11. Table 1 shows the results of this work for the national and regional models.

Table 1: Police functions and national and regional force models

	NATIONAL FORCE		REGIONAL FORCES MODEL		
FUNCTION	National and sub- national	Local level	National	Regional	Local Level
National Policing.	National	None	National security, ICT and national initiatives	None	None
Local Policing	Policy and resource management sub-national - specialist response	Community response	Policy	Specialist, Resource management, Response	Community response
Dealing with the Public (customer contact)	National and sub- national - customer contact and Control rooms	Front desk	Customer contact	Customer contact and Control rooms	Front Desk
Criminal Justice	National - FPN and CJ Sub-national - CRB and custody	None	FPN	CRB, Custody and CJ	None
Road Policing	National - Strategic roads, tactical roads, motorway patrols	Operational roads	Strategic roads and motorway patrols	Tactical roads	Operational roads
Special Operations	National - Major events Sub-national - specialist operations	Local deployment	Major events	Specialist operations	Local deployment
Intelligence	National	None	Intelligence gathering and analysis	Intelligence gathering and analysis	None
Specialist Investigations	National - Specialist, Serious and Public protection	Local Crime	Serious and specialist	Public protection, serious and specialist	Local crime
Investigative Support	National - specialist functions Sub-national - labs	Scene of Crime Officers	Specialist functions	Labs	Scene of Crime Officers
Support Services	National - Policy and transactions, Sub region - business partners, centres of excellence, hubs	Business partners	Policy, expertise and transactions	Centres of Excellence, business partners, hubs	Business partners

### 4. Main issues around future of policing in Scotland

- 4.1. The Council notes that, as presently constituted, police authorities have helped deliver cuts in crime, record numbers of police on the streets and growing public confidence in policing. Its recent Resident's Survey found the majority of residents rated the service they currently received from Strathclyde Police as Very or Quite Good.
- 4.2. It recognises that the present anomalous situation with policing in Scotland relates back to the creation of the existing force structure which resulted in some relatively large and some relatively small establishments. This has meant that some communities benefit from economies of scale, whilst others have to pay for expensive duplication of services at a non-cost-effective rate. In the context of the current climate, significant cuts to the police service, and the need to minimise the impact on the number of frontline police officers in communities, the Council believes that what is required is an evolutionary approach to change rather than a revolutionary one.
- 4.3. The Council believes that all proposed changes should be supported by a comprehensively costed plan, which takes into account both short and long term investments required, the need to include transitional arrangements, and potential savings to be accrued. The particular aim should be to see significant and clearly defined savings over a five-year period. No national reform should take place at the expense of local service delivery.
- 4.4. The reform of any public service needs to focus on improving outcomes for the public and encouraging more holistic approaches. It believes that this is best achieved through bringing public services together at a local level to deliver the national priorities in a local perspective. The discussions must not just be about structures and financial accountability but should focus on the best outcome for the individual and communities that meets their needs.
- 4.5. The Council firmly believes in the model of policing by consent, that the police need to operate with the consent and trust of local communities. It also agrees that the long-standing notion of police operational independence should be respected and that a politician should not be able to give directions on the detail of such operations.
- 4.6. The range of statutory duties and responsibilities that the police have has increased significantly, with a range of additional responsibilities having been added. Any review of policing in Scotland should seek to rationalise these responsibilities and set clear strategic direction for policing that reflects the views of the public and secures the best possible value for money with the available resources. Similarly, the cost of policing could be offset to some extent by charging realistically for non-public policing responsibilities.
- 4.7. The moves towards an outcome approach and the acceptance of the benefits of early intervention and prevention and a holistic approach to solving problems has provided the greatest opportunities for improvements in community safety and the outcomes for individuals and communities.
- 4.8. In South Lanarkshire, there has been for a long time a strong partnership between the Council and the local Strathclyde Police division, in particular at an operational level with joint structures and operational police officers who directed by the Divisional Commander support collaborative working in areas such as anti-social behaviour, architectural liaison, counter terrorism, etc -and regular meetings are held

to discuss public and organisational issues. This has seen an ever closer and deeper relationship in a range of policing areas – both national and local.

- 4.9. This relationship covers a wide range of areas. It has seen the creation of a joint Anti-Social Behaviour Strategy and a joint Community Safety Strategy with associated activity effective Information Sharing Protocols, Procedures and associated joint training, shared Public Consultation, joint working on Anti Violence, diversionary and community initiatives as well as joint training in areas like Anti-Social Behaviour, Public Protection, Information Sharing, Counter Terrorism, Emergency Planning, etc. There are also all the issues around Child Protection, Adult Protection, MAPPA, Harm Reduction, Community and Criminal Justice, Domestic Abuse, the Contest Strategy, Licensing, Procurement, Risk and Fraud Management, Diversity Monitoring, Road Safety, etc and through these linkages improved outcomes are being achieved.
- 4.10. The Council supports the proposal for a rationalised police force model rather than a national one or the existing model. It believes that this would be most likely to both retain the linkages with other services that are needed to improve outcomes for individuals and communities as well as be more likely to ensure that policing continues to be delivered by consent and retains public support. It believes that cultural changes such as those achieved in the Fire & Rescue Service could achieve some of the improvements being sought at less cost than structural change and upheaval.
- 4.11. The Council recognises that this may need further work to be undertaken to review how the Police Service is best organised to deal with those challenges that need to be considered and planned for at the national level. The Council notes that the Sustainable Policing Project identified the regional force model as providing long term financial sustainability. It also notes that the project identified the need for regional hubs in a national force for five of the ten policing areas it identified.

#### 5. Employee Implications

5.1. There are no employee implications.

## 6. Financial Implications

6.1. There are no financial implications.

#### 7. Other Implications

7.1. There are no other implications.

#### 8. Equality Impact Assessment and Consultation Arrangements

- 8.1 This report does not introduce a new policy, function or strategy or recommend a change to an existing policy, function or strategy and, therefore, no impact assessment is required.
- 8.2. There was also no requirement to undertake any consultation in terms of the information contained in this report.

Robert McIlwain Executive Director (Corporate Resources)

## Link(s) to Council Values/Improvement Themes/Objectives

- Improve health and increase physical activity;
- Improve lives of vulnerable children, young people and adults;
- Develop services for older people;
- Partnership working, community leadership and engagement;
- · Tackling disadvantage and deprivation; and
- Working with and respecting others.

#### **Previous References**

None

## **List of Background Papers**

A Consultation on the Future of Policing in Scotland Sustainable Policing project – Interim report The Sustainable Policing Project – Phase 2 report – Options for Reform

#### **Contact for Further Information**

If you would like to inspect the background papers or want further information, please contact:-

Alex Morton, Manager, Central Research Unit

Ext: 3829 (Tel: 01698 453829)

Email: alex.morton@southlanarkshire.gov.uk

#### **APPENDIX 1:**

#### Question 1:

#### How could police reform improve services and the delivery of Outcomes?

The Council notes that, as presently constituted, police authorities have helped deliver cuts in crime, record numbers of police on the streets and growing public confidence in policing.

The Council also notes the comments by Sir Ronnie Flanagan in February 2008 in his independent review of policing in England and Wales that, while 'national politicians have focused on structural reform, I am convinced ... that it is cultural change which is most likely to make the biggest difference to confidence, trust and satisfaction in policing.'

The Council believes that the reform of any public service needs to focus on improving outcomes for the public and encouraging more holistic approaches. It believes that this is best achieved through bringing public services together at a local level to deliver the national priorities in a local perspective. The discussions must not just be about structures and financial accountability but should focus on the best outcome for the individual and communities that meets their needs.

The moves towards an outcome approach and the acceptance of the benefits of early intervention and prevention and a holistic approach to solving problems has provided the greatest opportunities for improvements in community safety and the outcomes for individuals and communities. The Council is concerned that the commitment to such an approach has tended to be somewhat lost recently, with the focus returning to that of the past, on inputs, like policing numbers.

The Council is concerned that moves to a single force might result in the attention of the police being focused on delivering what it seen nationally as important and neglecting local circumstances, challenges and needs and opportunities to improve outcomes.

In relation to where we are in South Lanarkshire, we have a proven track record of effective joint working between the Council, Strathclyde Police and other Community Partners. In this regard we work jointly to plan and deliver services and this pragmatic approach leads to improved services and outcomes. This approach has been recognised nationally and cited as an example of good practice.

Specifically we have a system and framework in place for planning, establishing and managing desired outcomes at a strategic and operational level. The success of the Community Safety Partnership here in South Lanarkshire has been fundamentally based upon working with Strathclyde Police, Strathclyde Fire and Rescue and other partners to address local needs based upon a shared understanding of community safety and effective joint working. Any reform should ensure that these good practice approaches are maintained, enhanced and encouraged.

#### Question 2:

What do you think are the greatest opportunities and challenges facing policing in Scotland today and how do you think they should be addressed?

The Council believes that serious organised crime (including drugs, people trafficking, guns, etc), terrorism, globalisation and the challenges of the information age, such as cyber crime, are all areas of national policing interest that entail detailed consideration of the issues and their impact at the national level. The Council believes that the current arrangements for dealing with these national policing concerns are working but recognises

that structural reform may be required to achieve consistency of policy and practice in these areas. However, it believes that no national reform should take place at the expense of local service delivery.

The consultation itself recognises that a move towards a national or regional policing structure may entail a reduction in the ability of the police to work with local community planning partners to develop shared localised approaches to planning and delivery of services. It is essential that if these options are progressed, appropriate safeguards are put in place to mitigate this risk.

The Council notes that while the recorded crime levels show significant improvements, the fear of crime continues to increase. The results from our 2010 Resident's Survey show 11% had a high fear of crime and 35% a moderate fear, against 9% and 27% respectively in the 2007 survey. It found 25% perceived the effect on their quality of life as being Great or Moderate – and this situation remains a key challenge facing all those involved in community safety, not just the police.

It is important that in the debate on the future model of policing in Scotland the local nature of most people's concerns is not lost. The major problems identified in the Council's survey of over 4,500 residents in 2010 were around dog fouling, speeding, rowdy behaviour, groups hanging about and drinking in public – replicating the results of earlier surveys. The survey also found that 70% had no experience of anti-social behaviour, with the most common experiences being of rowdy behaviour, littering, noisy neighbours/ loud parties and vandalism or deliberate damage.

The Council believes that, in respect of the local challenges, the need is to invest and build on existing approaches and structures with closer operational collaboration, community engagement, prevention and diversion as well as enforcement.

#### **Question 3:**

# How can partnership working between the police and other organisations be improved?

In South Lanarkshire, there has been for a long time a strong partnership between the Council and the local Strathclyde Police division, in particular at an operational level with joint structures and operational police officers who – directed by the Divisional Commander - support collaborative working in areas such as anti-social behaviour, architectural liaison, counter terrorism, etc - and regular meetings to discuss public and organisational issues.

Community planning and the outcome based approach have helped improve partnership working and provided means and mechanisms to deepen and widen joint activity and a shared view of local circumstances and needs. One issue of concern has been the tendency of central government, mostly in the past, to set narrow, task-orientated performance targets and the impact this could have if these cascaded down to drive local policing. The Council believes that the present system which sets performance and targets based on force priorities and local divisional priorities, with both being informed through community consultation processes and a review of crime trends, emerging issues/ threats is a model that is best suited to deliver the improved outcomes that are sought. The Strathclyde Community Policing model has as its central premise local policing plans for each ward area which are developed following consultation with local communities and reflect their concerns to which officers and senior management are held to account in terms of delivering positive outcomes to these communities. The Council believes that this approach needs to be at the heart of any reform of policing in Scotland and that its

concerns of narrow, task oriented performance targets being set and cascaded down to local policing needs to be guarded against..

In South Lanarkshire, there has been for a long established partnership between the Council, the Police and other Community planning partners particularly at an operational level with joint structures, procedures and protocols with specific emphasis on the award winning Joint Problem Solving approach established in 2004. Six local problem solving groups review issues and identify trends.

Supporting this problem solving approach is a protocol for Information Sharing which was developed jointly by the Council and the Police. There are two aspects of the protocol, one which allows for routine proactive disclosures by the police and the other which handles requests for information requested by local housing offices in support of an antisocial behaviour investigation. The protocol provides a coordinated response and approach and involves agreeing joint approaches and delivery on specific cases.

#### .

#### Question 4:

## How can the police better engage with communities to help them be more resilient and self-reliant?

In South Lanarkshire, the community policing teams hold regular public consultation events to identify local priorities and provide feedback. There are also Joint Problem Solving Teams and there has been significant investment in diversionary activities, including using Scottish Government funding, and in public reassurance activities.

In relation to the police, the Council believes that aspects of their engagement should be driven by consideration of the particular characteristics of some population sub-groups that contribute to problematic relationships with the police. Consideration should then be given to how far these underlying characteristics apply to various communities present in the force area, and how these might be alleviated within the framework of policing. In its answer to question 10, the Council outlines some of the ways that the police could adopt to implement this approach

The approach adopted through the Community Planning structures in South Lanarkshire is based on a common engagement approach and programme for engagement which conforms to the Scottish National Standards for Community Engagement. These include activities such as: 'Positive Communities' engagement events where the key focus is to bring services closer to communities and ensure that the views of local communities are built into wider problem solving and service delivery approaches; 'Choices for Life' - an annual event led by Strathclyde Police involving local partners to provide information to families on the variety of diversionary initiatives available locally; 'Hamilton Safer Streets' a festive period initiative to tackle town centre violence led by the Police through the Community Safety Partnership. Particip8 Overton, a Scottish Government/ CoSLA 'Community Wellbeing Champions Initiative' a pilot involving participatory budgeting where local communities decide on how council funding will be spent. Community Policing Officers along with the council's Police Liaison Officer sit on the local steering group including local residents and council officers.

# Question 5: What arrangements and relationships do you think would lead to the greatest improvements in national and local accountability?

The Council firmly believes in the model of policing by consent, that the police need to operate with the consent and trust of local communities. A citizen must believe that the

powers enforced by the police are both just and necessary. It also agrees that the longstanding notion of police operational independence should be respected and that a politician should not be able to give directions on the detail of such operations.

In relation to a national force, the Council recognises the concerns of some that a centrally directed police service is a potential threat to liberty and, in extremis, an instrument of tyranny. It also recognises the Government's ultimate responsibility for the protection of society. The Council is concerned that a national centrally directed force seen as being responsible to a 'police minister' could result in the over involvement of politicians in policing and that politics often takes a short-term approach to solving problems. This can result in a situation where long term effective planning is replaced by initiatives to fix problems speedily and efficiently.

The Council notes the examples given of a single national police force that have developed arrangements to manage the relationship between the Government and the police, but believes that care need to be taken in trying to translate such models into Scotland given the differences in cultures and context. If policing becomes politicised and the police are seen as partisan, this will affect the trust and legitimacy the public place in them, "authority, to justify its title, must rest on consent ... power is tolerable only so far as it is accountable to the public".

The Council believes that crime reduction and prevention in particular requires a partnership approach – as evidenced in South Lanarkshire - but the tendency of national governments is to set narrow, task-orientated performance targets and requirements for specific organisations, such as the police, which can militate against effective teamwork.

#### Question 6:

## Do you agree that change is necessary to protect frontline services?

The Council believes that all proposed changes should be supported by a comprehensively costed plan, which takes into account both short and long term investments required, the need to include transitional arrangements, and potential savings to be accrued. The particular aim should be to see significant and clearly defined savings over a five-year period. No national reform should take place at the expense of local service delivery.

Reforms should aim to enhance service delivery by reducing unnecessary bureaucracy in order to free up the police to focus on effective operational delivery.

The range of statutory duties and responsibilities that the police have has increased significantly in recent years. Any review of policing in Scotland should seek to review these responsibilities and set a clear strategic direction for policing that ensures a focus on key frontline services.

The present anomalous situation with policing in Scotland relates back to the creation of the existing force structure which resulted in some relatively large and some relatively small establishments. This has meant that some communities benefit from economies of scale, whilst others have to pay for expensive duplication of services at a non-cost-effective rate.

In the context of the current climate, significant cuts to the police service, and the need to minimise the impact on the number of frontline police officers in communities, the Council believes that what is required is an evolutionary approach to change rather than a revolutionary one. The Council believes that all proposed changes should be supported by a comprehensively costed plan, which takes into account both short and long term

investments required, the need to include transitional arrangements, and potential savings to be accrued.

Reforms should aim to enhance service delivery by reducing unnecessary police bureaucracy in order to free up the police to focus on effective operational delivery. Freeing up the service to continue to deliver within a difficult financial climate will be essential to delivering efficiency and effectiveness.

The range of statutory duties and responsibilities that the police have has increased significantly, with a range of additional responsibilities having been added. Any review of policing in Scotland should seek to rationalise these responsibilities and set clear strategic direction for policing that reflects the views of the public and secures the best possible value for money with the available resources.

The cost of policing could be offset to some extent by charging realistically for non-public policing responsibilities.

#### Question 7:

## Which option do you think should be pursued and why?

The Council believes that the current tripartite relationship should continue but that it must be more clearly defined. It must balance the policing requirements with local democratic accountability, delivered by effective professionals, supported and enabled by Scottish Government. To be effective the tripartite relationship must operate within a national framework that links the local to the national and no national reform should take place at the expense of local service delivery.

The Council supports the proposal for a rationalised police force model. It believes that this would be most likely to both retain the linkages with other services that are needed to improve outcomes for individuals and communities as well as be more likely to ensure that policing continues to be delivered by consent and retains public support. As has stated earlier it believes that cultural changes could achieve some of the improvements being sought at less cost than structural change and upheaval. It recognises that this may need further work to be undertaken to review how the police service is best organised to deal with those challenges that need to be considered and planned for at the national level.

The Council believes that it is essential that the scope for localised planning and delivery of service is maintained and that the appropriate balance is achieved between national policing requirements and local democratic accountability.

#### **Question 8:**

How could we best improve accountability, deliver efficiencies and deliver service improvements at local and national levels?

In South Lanarkshire, there is a strong community planning Community Safety Partnership as well as strong operational mechanisms, including Joint Problem Solving Groups and operational police officers who — directed by the Divisional Commander - support collaborative working in areas such as anti-social behaviour, architectural liaison, counter terrorism, etc. The community planning Single Outcome Agreement has provide a renewed focus on both the identification of agreed outcomes and the interrelationships between issues and actions in other areas to community safety. As part of a wide range of consultation and priority setting, Local Policing Plans have been produced and feedback arrangements put in place to focus on local priorities and hold officers to account. The local

commander also holds regular surgeries with local councillors and senior officers of the Council.

If a proportion of Council Tax is spent locally on the police, then the Council believes that councillors, as representatives of local people, ought to have some level of involvement in how their area is policed – though not over operational matters.

At the local level, the Council sees three elements as being important in relation to local police accountability: -:

- 'responsiveness' this refers to behaviour (actions and their conduct) by the police which should be driven by national and local priorities and need;
- 'answerability' the process through which the police are held to account, are required to explain (and justify) their actions and how they relate to local people's concerns and input; and
- 'structural accountability' the formal set of institutionalised relationships that should help to bring about appropriate responsiveness and answerability; governance and scrutiny arrangements.

Any new policing model must ensure that these three elements of local accountability are embedded within it.

#### Question 9:

Do you have any views on how the process of change should be approached, including the extent and pace of change within a given option?

The Council believes that the change process needs to be handled in such a way that it is clear that the principle of policing by consent remains paramount.

The option to retain the status quo with increased sharing of resources and collaboration is seen by the Council as the easiest to implement but this is unlikely to be sustainable in the medium to long term.

The option of moving to a reduced number of forces is again seen as being one which would be relatively easy to implement. However, it would require more consultation and deliberations to ensure the public understands the reasons and advantages of such a change and could be viewed as an evolutionary change.

The single national force is a much more radical departure and break with the past and the Council believes that such a revolutionary change could only be countenanced after a considerable period of consultation and debate at both a national and local level.

### **Question 10:**

To assist with our Equality Impact Assessment on the reform, please describe any equality issues (in relation to race, gender, disability, age, sexual orientation, transgender people and religion) relevant to each of the options.

Whatever organisational structure is finally adopted, the police will have to operate within the existing equality regulations and the Council believes that the challenges will be as they presently are.

As stated earlier, the Council is a strong supporter of policing by consent, but it recognises that there is not one public but many publics, and that policing impacts upon these in sharply contrasting ways, policing will, for example, involve adversarial contact with certain

members of the public at certain times. The growth of social and cultural pluralism in this respect poses a challenge for a police service that must attempt to balance and respond to conflicting demands from an increasingly diverse society. Given the range of public views about and expectations of policing, universal popular approval for the police can never be a realistic aim of police-community relations policies.

In relation to the police, the Council believes that rather than selecting relevant groups from a pre-defined list, police forces should start by considering the particular characteristics of some population sub-groups that contribute to problematic relationships with the police. Consideration should then be given to how far these underlying characteristics apply to various communities present in the force area, and how these might be alleviated within the framework of policing.

This approach would require the police to identify the relevant groups in their area using official guidance, local audits, individual networking by officers known to have strong community links, identifying individuals or groups as well as pre-existing consultative frameworks, etc. It could also be problem-led (consulting with particular groups is related to specific problems) as well as responding to a direct approach from groups in the community group themselves.

The Council believes that in the Equality Impact Assessment of the policing options consideration needs to be given to how easily the different options of such an approach could be implemented and delivered.

#### Question 11:

To assist with our Regulatory Impact Assessment, please describe any financial or other impacts for business, charities and the voluntary sector relevant to each of the options.

The Council does not feel it is a position to comment usefully on these matters

### Question 12:

Do you think there needs to be any change to the existing roles and responsibilities of the key bodies responsible for policing?

The Council recognises the anomalies and inconsistencies in the current policing arrangements but believes that the tripartite arrangement for policing continues to have relevance. It believes that this review of policing should be seen as the opportunity to review policing and its governance to ensure the correct balance within the tripartite relationship and to enhance the ability of local people to influence how their communities are policed. It believes that any changes in roles, responsibilities and structure must start from this point.

The Council is aware of the issued raised by the initial Joint Best Value Audit and Inspections of police authorities which identified areas for improvement in existing police accountability and scrutiny arrangements. It also notes the Accounts Commission call for greater clarity of roles and responsibilities and more support for board members in carrying out these roles. It believes that the existing structures will be able to respond to these challenges and that improvements will occur which will strengthen these organisations.

At the national level, it notes the complexity and demands it places on mutual co-operation, mutual compliance and mutual accountability to a wide range of parties which raises concerns over public confusion over who does what and who is responsible to whom. In

meeting the national challenges, the Council believes that the policing functions involved would benefit from operating as a full national operational service.