

Written evidence submitted by Police Superintendents Association (POP0073)

Home Affairs Committee inquiry into Policing Priorities

Police Superintendents' Association Response

What a modern police service, fit for the 2020s and beyond, looks like;

1. Since 2016, the PSA has been actively involved in influencing work to research, plan and develop policing services that are fit for the future.
2. The need for focus and strategic thinking in these areas has been a priority, and the association's president and national team have influenced national work in this area, including work as a critical friend in the development of the College of Policing's Future Operating Environment, and supporting / contributing to the Police Foundation's Strategic Review of Policing.
3. We believe the Police Foundation's report is an excellent basis from which to begin work to determine and understand policing priorities and we would stress that this work is not dismissed, nor that efforts are duplicated.
4. It is crucial that the choices of today are made with clear consideration and understanding of the world we face tomorrow. We must build foundations and an infrastructure that enables our Service to flex and adapt to the challenges and demands of policing, so that we can be certain we will continue to change at a rapid pace.
We must also be acutely aware of wider national and international tensions and change that will have inevitable impacts on policing, these include state tensions, the unregulated information space, rising inequalities and fragmented societies, exacerbated by the cost-of-living crisis, the global impact of climate change and changes in demography.

Workforce

5. Our workforce planning needs to radically modernise to reflect the surge in recruitment, the new age profile of policing, retirement trends and future demand. Innovative thinking needs to be applied in all areas of potential crossover between the skills typically found within the private sector workplace and policing.
Our current generation of officers and staff must start to think with the mindset of the new generation, passing on good practice, but being flexible to allow diversity of thought for current and future problems.
6. The recruits entering the service now will be the superintendents, chief superintendents and chief officers of tomorrow. Good, effective leaders, need to act based on strong values that should be the bedrock of everything we do as a Service. Whilst operational training is essential to enable Service

delivery, we need to place similar emphasis on the importance of standards, ethics, values and behaviours, which will ensure we are supporting and developing people that can adapt to the changing demands they face, with unwavering commitment to professionalism.

7. We also need learning and development systems that are agile and are not hampered by slow and inflexible processes. When demand changes, we need people trained in the relevant skills and expertise to react effectively, supported by excellent talent management systems.

8. We need to learn from the private sector and become a Service and a workplace that people strive to join and in which they wish to remain. Building a workforce fit for the future means being forward looking in terms of the skills we need, rather than relying on historic workforce structures (or infrastructure) which we try to bend to suit current challenges, often too late and inflexibly.

9. In areas such as technology, the police Service can't afford to pay for the experience needed to keep a pace with development. We therefore lose countless skilled, talented individuals who cannot see a reason to stay within policing. In addition, changes to pay and pensions are forcing experienced officers to leave the Service early, as they face major financial implications if they stay.

10. We need to accept that the Service is no longer viewed by the younger generation of recruits as a 30 year vocation, but provide the infrastructure they need to flourish and deliver, with training and development opportunities that match the public sector, whilst also giving the unique sense of public duty that can only be found in bluelight services. The Police cannot compete as an employer in terms of offering salaries for cyber and technical expertise, but it can appeal to the values that are within communities.

11. There is a changing view on coming in and out of the police service, learning skills and moving on. We must be flexible in our thought processes around this, including what the younger generation may look at in terms of career planning, and how we can be flexible with our entry routes at all levels.

12. Covid has enabled the wholesale acceptance of flexible working with many positive results. Our workforce has shown without question that it can deliver without the restrictions of office-based hours on a 9-5 schedule. We have long supported the need for flexible working that enables our staff and officers to work in ways that align with their personal lives and it has enabled the most widespread workforce reform we have seen in decades.

13. We also stress the importance of 'organisational justice' now, and in the future, when it comes to decisions about police officer remuneration. Whilst this is required as a basic reflection of the nature of the work they are asked to complete, it will also support improved morale and motivation, driving productivity and preventing against corruption. This is a bespoke requirement, unique to policing, because of the employment status and restrictions on an officers' right to withhold their labour. With increased strikes being seen across a range of sectors in recent months, it must be recognised that every public service has a breaking point that effects operational output.

Technology

14. There is widespread narrative and evidence on the importance of technology within policing to keep apace with today's demands.

15. Technology should sit at the centre of the police service, and through developments such as the National Police Digital Service, this is beginning to happen. Progress must be faster and investment greater, so that technology is exploited to ensure that crime investigation, prevention and workforce specialisms grow at the same pace as the digital world.

16. We still operate in a system whereby 43 forces are not required to utilise the same digital systems, making cross force collaboration and data sharing difficult, and failing to make the most efficient use of private sector solutions. Data sharing across platforms is also key to avoid the risk of major risks such as those found through the Bichard Inquiry.

Wellbeing

17. We face a wellbeing and mental health crisis when it comes to the policing workforce. To be a workforce fit for the future, it is our opinion that is essential to mirror the investment we make into physical protection for our people, with investment for mental and psychological protection. Consultation data from our association and that of the Police Federation show staff morale to be at its lowest, and Police Oracle recently reported a 57% increase in the number of police officers who took time off due to psychological illness compared with the previous year. This cannot be ignored when we plan ahead for the policing of now and of tomorrow.

18. Policing is a hard, often traumatic job. The Occupational Health support offered to police officers and staff varies significantly across police forces. There is no nationally mandated requirement to provide minimum standards of support and as such, people are suffering and turning to police charities for help. Investing in this area of workforce support will add to the resilience and commitment needed for a workforce fit for the future. Prolonged and widespread sickness rates are a poor reflection on our duty of care as employers, and can be timely and financially challenging to manage – impacting overall effectiveness.

19. As strong supporters of the objectives behind the Police Covenant, we stress the need to implement its associated actions as quickly as possible so that tangible impacts are felt by those who need them. To date, progress has been far too slow.

Collaboration

20. Co-operation is essential across the public sector if we are to move to a system of working that can adequately deliver services to communities that are fit for purpose. Public safety is not the sole responsibility of the police, and many influences and factors must be considered, linked to a range of agencies to facilitate tangible action.

21. Individual funding, delivered through mechanisms that do not take account of competing demands and wider contexts can prevent this happening. Each organisation tends to work to their own targets

and performance agendas, rather than through a cooperative lens, with shared benefits. Data can help us understand shared demand on resources, workplace skillsets and where the overlaps are that can be addressed in partnership.

22. 'Coterminosity' between public sector agencies is crucial. It needs broad equity of roles and responsibilities for chief constables, health leads and local authority CEOs, all working together under the Crime and Disorder Act, with clearly defined outputs and outcomes. The recent government drive for police to work closely with the Fire Service is an example of how this could lead to successful joint working, but the arrangements must be based on consultation with both parties so that they can work in practice. Some of these partnerships have been set up to cut across two police force areas which will pose significant problems around the governance and accountability and will not be sustainable.

23. Better shared services will result in far greater understanding of community needs and priorities. Sharing data on the needs and experiences of communities will be the gateway to shared service provision with greater outcomes for all stakeholders. Excellent examples of this exist in silos, such as Violence Reduction Units (VRUs) and effective community safety partnerships, but we are long way from this becoming standardised across public services. Many of these, particularly evidenced through the work of VRUs, must also be seen as long-term initiatives, planned over a political cycle at the very least, to reflect the evolving nature of the problems being addressed and the wider context.

24. The relationship between the police and the private sector also needs to improve. The strategic focus of most private sector organisations is based on profit and does not focus on crime prevention. If a greater focus is placed by all bodies on the security of premises, goods and people, shared strategies can work alongside one another for shared impact.

25. The efforts and generosity of the voluntary sector should never be underestimated and are a key part of the delivery of public services. Their input and outcomes should be considered within all strategic planning and we should enable the delivery of their services in all we do.

Structures

26. The vast majority of those working within policing would agree that the 43-force model, which was established in the 1960s, is not suitable for today's policing or for that of the future. With forces having workforces ranging from 1,000 officers to 50,000 officers, being treated as the same entity is counter-productive.

27. A full and comprehensive understanding of how services need to be delivered, and where responsibility sits in terms of partner agencies is essential before any discussion around new structures can be meaningful.

28. It is widely believed that there is no current political will to change policing structures. Collaboration has not been the most effective strategy for the police Service, so 'coterminosity' is the middle ground where holistic benefits could be realised from similar geographic areas, with services coming together. This would clearly need a strategic consideration of what could be delivered at a local, regional, national and international level, but it is apparent that much of what is delivered at a local level could be

delivered nationally in partnership, without compromising operational independence.

29. It is also crucial that the work underway in these areas, through the Royal Commission launched around the Criminal Justice System and the Police Foundation's Strategic Review, are not carried out in isolation. This has been seen repeatedly throughout the history of policing, and resources need to align and speak to each other to address the same critical issues.

30. Any consideration or review of police structures must involve the right methodology. The first step is to determine demand, outputs, targets and objectives. Once these are defined, along with the role of police forces, demarcation can be made between whether a service should be delivered locally, regionally or nationally. Any 'targets' should be balanced, and should reflect local contexts. Our position is that nationally set, 'blanket' targets have no place in policing and can drive perverse behaviours that do not benefit communities or police forces. There will always be a need and a priority to react to crime, but prevention is key and is a longer-term, slower process of addressing root cause issues.

31. If we accept that any large scale change to police structures will not be delivered quickly, it seems clear that a faster route to infrastructure efficiencies would be to begin the process to 'nationalise' police procurement across the board. Currently, there is not enough collaboration across procurement around assets such as vehicles, uniform and kit, and little consideration for how nationally procured services such as administration and finance could make radical efficiency savings.

What balance police forces in England and Wales should strike between a focus on preventing and solving crime and carrying out their other functions;

32. The challenge in answering this question is the lack of clarity that continues to sit over the definition of the policing purpose.

33. Until there is a clear position on the fundamental duty and responsibility of police, there will remain ambiguity over where resources should be allocated, how performance should be measured and where calls for help should be directed.

34. Policing has for decades acted as the service of last resort, picking up the pieces where other public sector agencies have withdrawn or been unavailable. We are the service that cannot and will not say no to someone in need of help, and for that reason, it is incredibly difficult to measure true demand, or to hold the service to account when it comes to 'efficiencies'.

35. Despite this, one of the basic Peelian principles of policing is to prevent crime. This must remain a cornerstone of British policing, so there will always be more we can do to improve.

36. Crime prevention is difficult to measure in terms of impact, and in a Service that is often driven by resourcing challenges and value for money, efforts in this area can suffer.

37. Targets are frequently considered by those in power with regards to operational policing. Whilst accountability is fundamental to the core values of policing, it is the long-held belief of our association

that there is no place for blanket target setting within policing, which can skew the reality of ‘priorities’. Previous PSA President Irene Curtis was asked to carry out a review of police targets by then Home Secretary Theresa May, which evidenced this view. The report, which can be viewed [here](#), was accepted in full.

38. Whilst crime and demand data can usefully inform national decisions around resourcing and performance, there is much evidence to show that it is not a direct measure of police performance. Performance is affected by a diverse range of factors, not all of which are in the direct control of police.

39. Simplistic performance data such as numerical targets or binary comparisons can produce unintended consequences, including the instigation of perverse behaviours to satisfy generic targets, rather than to respond to the most harmful or important matters impacting on local areas. It would also be impossible to ensure that all forces begin a targeting regime from the same starting point.

40. We would be in strong support of a review of the national performance framework, led by the College of Policing and would provide the evidence, data and insight of our members to assist this. It is our belief that the College of Policing, guided by the recommendations and positive aspirations of the Fundamental Review, is the rightful place from which to set standards of policing in every form.

41. Further support is needed around technology to support crime prevention in both the private and public sectors. Huge progress has been made here and there are already countless technical developments that protect the public from crime, such as online fraud, but this type of crime is subject to exponential growth which policing cannot respond to on its own.

42. As referenced in the Police Foundation’s Strategic Review, more than half of crime is now linked to fraud and digital offences. Greater prevention is needed around internet-enabled crime, with responsibility sitting with those who profit from the use of digital platforms and services. This crime can be designed out, in partnership with police and specialist agencies.

43. Greater prevention is needed around internet-enabled crime where vulnerable people are targeted through social media platforms. Since recognising this type of crime, the Service has struggled to effectively record and deal with the volume of reports of harassment and bullying that occurs. More needs to be done by government in partnership with the companies that operate the platforms. The power and reach of social media is such that a solution of this kind may not exist, in which case legislation will need to be explored to prevent the damage that this kind of crime can cause.

What roles police forces should prioritise

44. The answer to this question aligns with the above comments relating to the need for a clearly defined purpose for policing.

45. In the current context, it is not possible to provide a simple answer to this question, with each force operating in unique, localised contexts involving diverse community needs and political environments.

46. That said, it is our view that the priority of the police should be supporting those who are vulnerable

to harm or exploitation and protecting the public.

47. This overarching approach should lead policing efforts, further determined by a true and accurate reflection of the most important matters impacting on the force area.

What can be done to improve community policing and increase trust in police officers and forces, including on funding and on disciplinary powers when police officer behaviour falls below required standards;

48. The Peelian principles on which the Police Service was founded remain at the heart of police legitimacy and enable the Service to police by consent. The relationship between the public and the police gives the Service the legitimacy to act, and this relationship is based on trust and confidence.

49. The issue of legitimacy has been fundamentally questioned in recent years more so than ever seen before. This began during the pandemic, as the Service has found itself having to use its powers in ways never seen before, followed by challenges around the policing of conflict and public order, and with extremely high profile cases of severe police misconduct and criminal behaviour.

50. Despite cases of police misconduct or criminal behaviour being small and representative of an extremely small part of the workforce, the impact these cases have on police legitimacy through the power of social and traditional media is significant. It's therefore important for the Service to work hard around setting and embedding standards and core values. When this goes wrong, and an officer goes against the high ethical standards the Service demands, it must be dealt with in an open and transparent way, to ensure that Service legitimacy is maintained.

51. Police legitimacy could also be better upheld through the embracing of technology. Police officers are under regular technical scrutiny as their actions are captured on body worn video, CCTV or via public mobile phone recording. As the vast majority of officers act with good and noble intentions, we should embrace this, providing further transparency and legitimacy, especially when the actions of officers are shown out of context and with no explanation.

52. Independent oversight of this use of technology to provide context and understanding of police powers would enable it to happen safely and appropriately. The accountability to which the British police officer must work, is significant, and rightly so. Officers face criminal law, civil law and misconduct processes and are under scrutiny and accountability to the workforce, the media and to the public before anything comes to the attention of the various independent bodies in place such as the IOPC, HMICFRS and the surveillance commissioner.

Misconduct processes

53. It is our belief that the current misconduct process involving hearings led by independent, legally qualified chairs (LQCs) is fair and correct, with the ability for chief constables to fast track dismissals in a given set of circumstances. LQCs were introduced in 2016 and are assisted by an independent member and a senior officer and, together, they make up the panel. Prior to that, hearings were presided over by either an assistant chief constable or a deputy chief constable.

54. The decisions of independent legally qualified chairs can be legally challenged and there is no evidence to suggest that dismissal outcomes have become less effective or appropriate under this system. Changing the system to give independent power to chief constables is unlikely to enhance public trust in the system, as power becomes vested in one individual. Rather, a consistent adherence to the current process would ensure that communities believe that there is one set of high standards for all police officers and that any breach of these will result in appropriate actions.

55. The investment, training and resourcing given to professional standards departments should also be significantly improved, so that those leading internal matters or rightly trained and equipped with the skills and knowledge to deal with these complex cases.

56. The IOPC is fundamental in delivering an open and transparent process to give confidence to the public, but the timescales, often impacted by the CPS and the coronial system are unacceptable to the public and to those under investigation, and can have the perverse impact of undermining confidence.

Representation

57. The police workforce is not representative of communities and services are not being delivered with legitimacy when it comes to ethnicity, and to other protected characteristics. This has led to a divided society in terms of trust and confidence in policing. Whilst the majority of the public have expressed trust and confidence in policing when asked, there are particular groups where there is clear distrust.

28. The Police Service must reach into itself for empathy with both under-represented group members and diverse communities. It needs to understand the views and perspectives of the people it serves who feel so misrepresented by their police service.

59. A huge part of ensuring legitimacy will be in creating a Service that looks and feels like the communities it service. The police workforce mix should therefore become a core part of the National Policing Board agenda and inspection regimes going forward, so that the Service is held to account on this matter with the same scrutiny applied to operational policing. Promotion processes including PNAC and SCC must be changed to ensure they are fully inclusive to officers and staff from every background. The PSA has been influential in work to progress this and now that it has been confirmed these processes will stop in their current form, we are working with colleagues at the College of Policing on the development of suitable replacements.

60. It is essential that we understand how we can be reflective of society now and for the next 30/40 years. Through our coaching and mentoring programme and Future Supers programme, we seek to propel those from a diverse background into diverse roles, adding to the richness of difference at leadership level, which will result in broad value across the Service.

61. The PSA has elected 'reserved representatives' on its National Executive Committee to represent the views and best interests of members from under represented groups. The aim here is to understand lived experience as far as possible from within our own membership and this is key. It is also essential that we do not create our own 'hierarchy of protected characteristics', neglecting those members of the

workforce who are marginalised. For example, 18% of working age adults live with some form of disability and we should expect similar numbers in policing to represent the communities we serve.

62. The PSA is also undertaking consultation with members and working with stakeholders to focus on the retention and progression of staff from under-represented groups. This also includes the acknowledgement of the importance of intersectionality and the need to understand and value difference in all its complex forms.

PCCs

63. The public needs greater understanding of the role of PCCs, which were designed to enable the public to have a voice in policing. By strengthening Police and Crime Panels to ensure PCCs themselves are directly accountable to the public, and enabling the public to challenge chief constables, greater clarity, understanding and legitimacy could be established.

Community policing

64. Most members of the public do not have a need to interact with the police. Their view of policing is formed by media, social media and police officers they see in their communities. With major cuts to the number of PCSOs, the image of 'neighbourhood policing' has been diluted, with many believing their areas are not served by police officers at all.

65. Significant work has been undertaken to ensure that the public understand the full breadth and remit of policing and the 'hidden harms' that must be addressed which impact on the most vulnerable in society.

66. A middle ground is required to ensure that we respond to the most serious crimes occurring day to day, from domestic abuse through to child sexual exploitation, whilst also having physical connections to communities through neighbourhood policing. Strict funding formulas have prevented forces from having flexibility in terms of how they deliver their policing model. As a result, community trust has diminished, but flexibility will enable chief officers to find the right mix and balance, and will enable police and communities to work together with partners to address low level local issues, build intelligence and restore trust and confidence.

What steps can be taken to improve national conviction rates, including via relationships with other bodies such as the Crown Prosecution Service.

67. Conviction rates are the result of many factors, ranging from police investigations to victim engagement, court timelines and CPS action.

68. Pushing forward with cutting edge technological solutions for evidential capture will enable best evidence to be secured at every available opportunity. Body worn video was slow to roll out across the country and should now be a part of the day to day kit of every frontline police officer.

69. Some forces have introduced online video calls with victims of domestic abuse, to speed up the time

it takes to progress a case and to record statements alongside video recording of physical injuries. This approach should be nationally accepted, with victims given the choice of how they wish to engage with police so that we move to a faster, more efficient way of progressing justice for victims and witnesses.

70. We have significant concerns that the investment in policing in the form of 20,000 new officers is not being matched within the Crown Prosecution Service. The current court backlog is unacceptable and victims are disengaging with police over the length of time it takes a case to get to court. More officers could mean more cases progressed without the capacity available within the court system to respond. Victims must remain at the heart of this. It cannot be right that we hear from our own members that they would not advise family members to report rape or sexual assault because of the length of time they would wait to be heard at court.

71. It has been reported on many occasions, including by previous Chief Inspector of Constabulary Tom Winsor, that the entire system needs to be radically overhauled to properly serve the public. Greater investment is needed in Her Majesty's Courts and Tribunal Service so that positive approaches such as the use of nightingale courts and 'wrap around' responses to youth offending can become standard practice. The Crown Prosecution Service is facing major challenges and it needs broad, diverse thinking to look at ways that all partners, including policing can help address this. For instance, we know that in some cases, criminalising young people, many of whom have been through adverse childhood experiences, for low level offences, is not the most appropriate course of action in terms of rehabilitation. 'Wrap around' provisions, including out of court disposals, working with partners in education and housing can lead to better outcomes for all.

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