

Independent review of ACPO

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Executive summary

The policing landscape is undergoing change of an unprecedented scale. Initiated by the Government's 2010 consultative paper *Policing in the 21st Century – Reconnecting the police and the people* there are a number of initiatives, in addition to the introduction of Police and Crime Commissioners (PCC) that are transforming the environment. In particular the College of Policing and the National Crime Agency are impacting on established practices and relationships at the national level while at the local level Chief Constables and PCCs are leading and managing significant change within each force. The catalyst for this report has been the need for PCCs to make decisions on the level of funding they provide from local force budgets to ACPO in the next financial year. However, the terms of reference are more extensive. They require an examination of the standing structures and functions currently delivered by ACPO in the context of the radically different national environment.

ACPO has delivered a critical and effective service over many years. Requirements have evolved over time, often as the pragmatic answer to an immediate challenge. The outputs remain necessary, but responsibilities for delivery are changing. ACPO currently provides operational coordination, national policing services and acts as the professional voice of the service. The status quo is no longer feasible, indeed steps are being taken to transform ACPO internally concurrently with this report. The requirement is a measured transformation resulting from a managed process of change which shifts responsibilities to the College of Policing and other appropriate bodies, one of which must represent senior police operational leadership at the national level, and should be directly connected to the Chief Constables' Council. It is surprising that the transformation of British policing is not structured as a strategic change programme which would normally be led or coordinated, perhaps in the manner promoted by the Office of Government Commerce (OGC).

Today the output from national units is either governed, funded or supported by ACPO, and there is no template solution. As the wider policing environment changes the governance and accountability of all the national units deserves scrutiny. Currently the system of governance is difficult to follow. A complicating factor is that ACPO exists as a company limited by guarantee; this requires commercial accountability practices to prevail. There

is a widely held perception that this is not consistent with a national institution acting in the public interest. There are alternative models to governance, funding and support currently provided by ACPO, such as the lead force, which are likely to simplify the current arrangement. Overall there is a need to streamline governance and financial accountability by reinvigorating the bilateral contact between forces and each national unit. This will ensure that individual force requirements are met in the most cost effective manner.

ACPO's responsibility to act as the professional voice of the service has been significantly altered by the introduction of the College of Policing, but it has not been removed. There is a requirement for a central focus at the national level which can act as a forum for the senior leadership of the police service. This would provide collective representation for those who are ultimately responsible for output at local level. It would be complementary, but not subordinate to those who ensure that the inputs are right, and who are being gathered into the College. And it needs to work alongside those who deliver national capabilities such as NCA. Both individual PCCs and Chief Constables will benefit from appropriate representation at this critical point in the hierarchy and the Chief Constables' Council element of ACPO is the obvious focus. This forum should have responsibilities that include the sharing of best practice, coordinating resources, adopting a common approach as employers and managing national consultation on operational matters. Furthermore the Chief Constable's 'command' responsibility to answer for the collective actions of police officers needs to be reflected at the national level.

ACPO does provide important administrative services, particularly in support of national units. It governs some commercial interests and acts as the home for CPOSA. There are alternative solutions, including more widespread use of the lead force model in the case of national units. These are factors that focus on inputs and do not appear to be essential to the effective operation of the wider police service. Maintaining an effective and credible forum for Chief Constables should be the absolute priority.

The PCCs currently provide around £4m for the operation of national units and ACPO Central. The sums involved offer value for money, although the current governance arrangements should be adjusted so that funds do not pass through a limited company. There will be scope for efficiencies, and these should be identified by consultation with each national unit and taking account of the operational needs in each

force. ACPO Central consumes around £1.2m of the total budget, it should be assumed that this amount is required initially to ensure the transition from the current arrangements to the support required by a reinvigorated Chief Constables' Council which can be effectively led, managed and administered.

PCCs have a direct interest in the cost effective operation of National Business Areas even though they are now primarily accountable to the College of Policing. They provide a critical capability to the police service, they release a considerable amount of specialist capability and enable the right levels of professional expertise to be directed at the huge range of challenges that are faced. They are managed on a voluntary basis and resourced by local forces. This is a pragmatic and effective mechanism which needs to be handled with care, but the governance arrangements deserve scrutiny. For example it is not clear how priorities are established or how Heads of Business Areas exercise authority over some very diverse portfolios and working groups.

The report's recommendations can be summarised as follows:

Recommendation one

There is a requirement for a Chief Constables' Council with a full-time Chair which should:

- conduct operational and managerial coordination between independent Chief Constables;
- act as the focus for *command and leadership* of the police service;
- maintain direct links to the National Business Areas to inform policy and implement practice; and
- speak with a coordinated and independent voice on the delivery of operational policing.

The mechanism has to be sufficiently sophisticated to generate consensus within the 43 Chief Constables, it must be transparent and operate within the boundaries of Government policy. The Chief Constables' Council should be invited to identify alternative governance and funding arrangements that enable effective operation without passing through a limited company. The current funding of approximately £1.2m represents a reasonable starting position for the process of transition from the current model to ensure the delivery of a credible future structure.

Recommendation two

The governance of each national unit should be clarified and funding should not pass through a

limited company. The Lead Force model already operates effectively in some cases and it is possible that for some units transfer to the NCA may be an option in time. The current funding of approximately £3m represents value for money. However, it may be possible to drive further efficiency through bilateral funding judgements between individual chief constables and each national unit that take account of local operational priorities. To achieve this the funds currently transferred to ACPO for this service should be subsumed into the overall operational budget of each force.

Recommendation three

PCCs should seek greater visibility of National Business Area governance and output. Even though the overall responsibility for management is transferring from ACPO to the College of Policing the level of resources that Business Areas consume at local level mean that PCCs remain a major stakeholder. The existing mechanism has many advantages and great care must be taken not to undermine it, in particular PCCs should recognise their individual responsibility to contribute to collective capability. However, the mechanisms require review to ensure transparency and cost effectiveness.

Recommendation four

PCCs should ask the Home Office to implement a formal, managed strategic change programme that integrates the changes taking place in the police service. It should oversee the development of the College of Policing, the transformation of ACPO, the implementation of the NCA and any other changes at the national level so that they can work seamlessly together and provide the appropriate capabilities that are vital to the success of policing at the local level.

Introduction

The funding of ACPO has been under consideration for some time. It is linked to a wider programme of changes in the police service. ACPO has historically been funded by a combination of Home Office grant and police authority funding. Its roles and responsibilities have grown as a pragmatic response to changing requirements over many years. In 2012/13 the Home Office temporarily increased financial support to ACPO to bridge the gap between police authorities and the Police and Crime Commissioners (PCC). However, it was made clear that there would be no funding from the Home Office in financial year 2013/14 unless agreed by PCCs. The Association of PCCs formed a working group to consider the matter, its initial recommendation was to continue ACPO funding for the financial year 2013/14.¹ Agreement was subject to a more fundamental and strategic report for APCC members, and the working group has been meeting with ACPO officials regularly since. Engagement has been constructive and the group has received significant support and information from ACPO. But this is recognised by all involved to be a complex area and, since funding decisions for financial year 2014/15 must be made by mid-November 2013, time is tight. It was therefore agreed in early September 2013 to commission a report from an independent party to make recommendations for consideration by the working group by end October 2013 with a view to presenting it to PCCs in November 2013.

The aim

To examine the standing structures and functions currently delivered by ACPO in the context of the radically different national environment of PCCs, the College of Policing and the National Crime Agency and make recommendations to PCCs on the requirement for a collective national policing function akin to that currently fulfilled by ACPO. In particular the effectiveness of the current arrangements, governance and accountability, and value for money are to be considered along with any alternative mechanisms to sustain effective output. The full terms of reference are at Annex A.

Scope

This study has been carried out in three parts: the first gathered basic data in order to establish a baseline financial position. Much of this work was

carried out by a contractor, Parthenon, who were directed to aggregate key financial and governance data from ACPO and its national units. This process produced the detailed statistics that have been used to inform the baseline position, the data has been examined by the subject areas and any further comments taken into account. Their full report is included as an enclosure. Concurrently a number of interviews with stakeholders have been conducted. The list of those consulted is at Annex B. The time available has meant that the list is not exhaustive, but it represents a full range of stakeholders and opinions. Finally a draft has been circulated to the APCC working group who commissioned the report [and to the President of ACPO]. [Account has been made of the further comments raised]

The history of ACPO

The history of Chief Constables working together in the common good goes back many years. In 1858, the County Chief Constables' Club was formed and in 1896 the Chief Constables' Association of England and Wales was formed to represent the chief officers of urban forces. They then combined in 1948 to form ACPO. Its constitution was formalised in 1990, and it was agreed that it should be funded by a levy on police authorities and a Home Office grant. In 1997 ACPO became a company limited by guarantee answerable to a Board of Directors.² It linked its professional accountability to Chief Constables through an elected Cabinet³ and established ACPO Business Areas. These focused expertise and provided an important expert view to government policy committees at the highest level. Since 1997 it has adapted, and taken on roles that have emerged, adopting a pragmatic approach to increasing or diverging its responsibilities. It has delivered an important service both in terms of leadership and by taking on centralised functions when there were no other obvious candidates to do so. It continues to adapt, most recently a business case proposing a future operating model was agreed unanimously by the Chief Constables' Council on 18 October 2013 and will be presented to PCCs.

¹ At the APCC General Meeting in June 2013

² There are up to 14 Directors: The President, three Vice Presidents, the Commissioner of MPS, the Honorary Treasurer, four chief officers, who represent the ranks of Deputy Chief Constable, Deputy Assistant Commissioner and Assistant Chief Constable, A representative of the rank of Commander, a representative of senior police staff, two non-executive directors (yet to be appointed).

³ Cabinet no longer exists having been subsumed into the College of Policing Professional Committee along with the National Business Areas.

The current situation

The Home Office consultation paper *Policing in the 21st Century*⁴ established a new approach to rebalance the relationship between government, the police and the public. It reinforced the role of the Chief Constable, recognising that the operational independence of the police is a fundamental principle of British policing. It introduced a clear line of accountability to the directly elected PCCs which enabled Chief Constables to take operational decisions to meet the priorities set for them by their local community.⁵ The paper recognised that crime is not confined to force boundaries and that there was a requirement to look beyond constabulary borders. The resulting national framework included the creation of the National Crime Agency (NCA) to lead the fight against organised crime, protect borders and provide services best delivered at national level. It triggered a review of the role of the National Policing Improvement Agency which has resulted subsequently in the creation of the College of Policing. This was announced in December 2011 and issued its first delivery plan for 2013/14 in September 2013. While both NCA and the College of Policing encompass some evolutionary change from the Serious Organised Crime Agency (SOCA) and NIPA respectively, their responsibilities are wider and both are engaged in a process of significant transition. The role and responsibilities of ACPO were not addressed formally as part of the transformation programme, although the removal of Home Office funding in 2012 meant that some review of responsibilities was inevitable.

Taken as a whole this represents a strategic transformation programme for the police service. At local level Chief Constables are charged with the leadership of change within their force and, along with the PCCs are getting on with it. At the national level it is less clear who, below the Home Office, has the collective responsibility to lead the totality of the transformation. Indeed the organisations that might otherwise be expected to do so are fully engaged managing their own internal changes.

It is also reasonable (although subjective) to highlight the level of scrutiny that operational policing is currently experiencing. A number of high profile and emotive issues are being discussed regularly in the media, these are impacting on both internal and external perceptions of the contemporary policing

environment. They are not an issue for this report, except to note that they will influence the service at every level and put pressure on everyone who holds the office of constable. It is reasonable to conclude therefore, that there is already a significant leadership challenge throughout the service's hierarchy without the impact of further change.

What does ACPO do?

ACPO's statement of purpose is that it is an independent, professionally led strategic body. It states that it operates in the public interest and, in equal and active partnership with government and partner agencies, ACPO leads and coordinates the direction and development of the police service in England, Wales and Northern Ireland. In times of national need ACPO, on behalf of all chief officers, coordinates the strategic policing response.⁶

For the purposes of this report ACPO outputs have been considered under two headings:

- Operational coordination and national policing services
- Acting as the professional voice of the service.

These are supplemented by corporate services considered necessary to support the ACPO infrastructure. All ACPO's business is linked to varying degrees to the Chief Constables' Council.

Operational coordination and national policing services

The devolved nature of British policing does not remove the responsibility for a coordinated approach to operational output which promotes effectiveness, particularly through interoperability and efficiency. As the pressures on budgets increase the need for collaboration in service delivery will undoubtedly grow. Over the years ACPO has shown that it is effective in forging national agreements in respect of operational policing. This output is now largely delivered through seven independent units and two commercial interests. ACPO interacts with the national units by: providing governance, operational coordination, setting requirements, funding and support. A summary of these relationships is shown in the table at Annex C.

This is a complicated matrix which indicates that a templated solution will be difficult to identify. AVCIS and CPI should be considered separately since

⁴ *Policing in the 21st Century: reconnecting police and the people*, Home Office, 26 July 2010

⁵ *Ibid* paragraph 2.13

⁶ Memorandum and Articles of Association of the Association of Chief Police Officers of England Wales and Northern Ireland incorporated on 1 April 1997.

these are run on commercial lines; for the rest of the national units ACPO is currently a critical player in the governance structures, it provides linkages to the Chief Constables' Council and the National Business Areas, particularly when considering and setting operational requirements. The creation of NPoCC has introduced a particular focus on operational coordination where the role of the ACPO President and the Chief Constables' Council is key to the effective reaction to large scale incidents. Funding and support services are provided by ACPO for some, but not all of the units.

Acting as the professional voice of the service

The second of ACPO's functional responsibilities has historically been to act as the professional voice of the service. This requires ACPO to represent senior police leadership at the national level with a wide range of stakeholders including government. It provides a professional forum for Chief Police Officers (not just Chief Constables) to share ideas, expertise, best practice and co-ordinate resources. It has been required to respond to national consultations on strategic reform and operational matters. Many of its responsibilities in this area are now being transferred to the College of Policing but the exact division is not yet clear. The ACPO Business Case⁷ articulates a requirement to provide an effective forum where Chief Constables, as employers, should be able to discuss and agree common approaches to key staffing issues such as severance, direct entry and misconduct matters. There are two bodies that are designed to meet ACPO's responsibilities in this area: the Chief Constables' Council and the National Business Areas.

The Chief Constables' Council is the senior operational decision-making body for ACPO. It is formally recognised in ACPO's Articles of Association, which link its practice to the objectives of the company limited by guarantee. It provides a forum to discuss and consider issues and challenges in operational policing and, alongside the College of Policing, agree national standards and common approaches. Its role also includes securing national interoperability and coordination of policing work, and providing value for money for the citizen. It provides the operational accountability for ACPO's activities through a programme of regular meetings with formal agendas. The President of ACPO is a full time appointment of Chief Constable rank who is also the Chair of the Council. The Council meets

formally four times during the year. The secretariat is provided as part of ACPO's corporate functions.

The National Business Areas⁸ have been developed to capture the vast range of expertise required in contemporary policing. British policing practice means that the priority for investment is on operational activity and the front line rather than training and support. The Business Areas provide a centre of expertise which enables the development of good practice, standards, doctrine as well as 'spokespersons' (both in development of national policy and externally to the media when required). They are hosted by forces, work alongside the College and utilise the Chief Constables' Council for agreement of standards. ACPO central provides a 'signposting' and coordination function between Business Area. The diagram at Annex D shows the top level structure which is divided into twelve areas. Each Business Area is led by a Chief Constable, the position is unpaid and voluntary, taken on in addition to other duties. It is not formally ratified by the Chief Constables' Council. Complex Business Areas may comprise a number of national policing portfolios and working groups focusing on more specific topics with representation that can draw expertise from across the service and at every rank. It has proved difficult to establish exactly how many working groups there are (in excess of 300), which remain relevant and what the procedures are for removing those that are no longer required. Responsibility lies with the Business Area Heads for governance, coordination of activity and the issuing of advice.⁹ They are now accountable to both the College of Policing Professional Committee whose terms of reference are still in draft¹⁰ and to the Chief Constables' Council for matters relating directly to employment and operations. Generally the costs incurred by Heads of Business Areas and their related activities are borne by their home force. Where relevant, Heads of Business Areas oversee the work of ACPO national units.

Providing corporate services

ACPO Central provides the necessary corporate services to support the ACPO infrastructure and other associated organisations. It is run as a company limited by guarantee, this was agreed in 1997 as a pragmatic way to provide a legal framework to rent accommodation and hire staff. It provides secretariat support to the Chief Constable's Council, human

⁷ Agreed by Chief Constable's Council on 18 October 2013

⁸ Formerly ACPO Business Areas

⁹ Set out in the ACPO Articles of Association

¹⁰ College of Policing, Professional Committee, Terms of Reference Draft v3. 20 June 2013

resources, financial services, event management, facilities and IT support. It includes a national communications office which is charged with building and enhancing the reputation of policing nationally, working with force press offices to generate positive stories and responding to inaccuracies in the national media. In addition support is provided to the Chief Police Officers' Staff Association (CPOSA) and the company secretary to ACPO¹¹ and Crime Prevention Initiatives Limited. Its corporate governance as a company limited by guarantee is provided by a Board of 14 Directors and chaired by the President of ACPO. It is based at ACPO HQ and is funded by PCCs, charges to national units, annual membership fees from Chief Officers, and royalties for the use of the ACPO logo.

Chief Police Officers Staff Association (CPOSA)

CPOSA is a staff association representing the interest of all chief police officers and officers held to be of equivalent rank throughout the force, including consideration of matters relating to conditions of service and the promotion of their welfare. It represents chief police officers at a national level at the Police Negotiating Board. It articulates a collective Chief Police Officer voice and perspective on range of related internal policy issues. Since ACPO is not recognised as a Trade Union, this responsibility is placed on CPOSA. Its Director General is an appointed Chief Constable, it is funded by membership subscription and is staffed by volunteers, with minimal staff support from ACPO.

Are the outputs required?

A national capability

Policing in the 21st century emphasises the need for effective national and regional collaboration. The latter is a matter for Chief Constables and PCCs with neighbouring forces and has resulted in a number of effective initiatives. Some national policing services are undertaken by the ACPO national units which have already been covered. They have evolved over time and it has been assumed that the outputs that they currently deliver remain relevant although there may be scope for further development. National collaboration is required to respond to the Strategic Policing Requirement (SPR)¹² which came into effect in November 2012 and which helps PCCs, in consultation with their Chief Constable, to plan effectively for

policing challenges that go beyond their borders and guides Chief Constables in the exercise of these functions. The Policing Protocol Order 2011 directs PCC and Chief Constables to have regard to the *Strategic Policing Requirement* (SPR). The SPR defines the capacity and contribution expected from local forces, the capabilities that they must hold to deal with national threats, the need for consistent delivery across all police forces and the requirement for capabilities to be effectively joined up. These are operational requirements which all require national level coordination through NPoCC. This has to ensure appropriate levels of preparation and, when action is required ensure a timely and effective response. It has established a standing capability to react to unforeseen or large scale commitments and it has created a focus for training and exercising. Its capacity to coordinate depends on the ability to influence individual chief constables and current mechanisms rely on ACPO to coordinate this. When the Government's crisis management organisation is activated, normally through briefing and direction at the Cabinet Office Briefing Room (COBR), there is a requirement for the police service to be represented by an informed and empowered individual with sufficient experience to contribute effectively to ensure rapid and appropriate reaction across a large number of forces. Advice will be required by a multitude of stakeholders and it may be necessary to challenge direction which may not be lawful and therefore not in the public interest. It is important to ensure that the complexity and risks of strategic decisions are properly considered in this forum, and only the most senior and experienced individuals, with a direct link to individual Chief Constables, will be suited to this task. Currently the ACPO President fulfils this role.

Policy and practice

The Home Office note *College of Policing: an Introduction* published 16 July 2012 identified that the police service is facing a series of challenges which cannot be met by relying on the existing structures at a national level. The creation of the NCA and the College of Policing are key parts of the organisational change to meet this requirement, but it is not clear what additional bodies may be required. However, there is clearly a need to link the formulation and dissemination of policy and procedures to a credible collective operational viewpoint or filter. The College of Policing should take on the leadership of much of the policy work. In this the National Business Areas will remain a critical resource. They are already answering to the College, although instructions are still in draft and understanding of the changing

¹¹ As a company limited by guarantee

¹² The Strategic Policing Requirement July 2012

requirement is patchy across the service. Importantly it would be wrong to assume that there is a clear dividing line between policy and practice and the Business Area structure will remain important in supporting the national coordination and collaboration between police forces on operational matters.¹³ There are also concerns that the wide representation of stakeholders within the College, and the processes necessary to ensure appropriate consideration, may delay the implementation of tactical procedures. Chief Constables should retain an important stake in the speed of decision-making and the priorities set to address issues. This will allow Business Area Heads to ensure timely, credible implementation and, if the situation demands it, provide an effective counter to obfuscation by other stakeholders within the College who may not have responsibility for operational effect. It is therefore judged that regular consideration of developing policy and first hand involvement in its implementation will remain a responsibility of the Chief Constable's Council.

Operational effectiveness

Much of the justification for the requirement to bring Chief Constables together regularly and formally has been based on operational effectiveness. There is a need to provide a transparent forum to develop national agreement and coordination in order to safeguard and provide value for money for the citizen. There will always be a requirement to consider business that is major or controversial, to exercise a degree of collective responsibility for the use of police powers and the implementation of national standards. This is a necessary balance to the increased emphasis on delegation to PCCs and their Chief Constables. It will ensure that the deliberations between individual PCCs and Chief Constables is underpinned by a broader context. The policing Protocol Order 2011 makes it clear that *the PCC has... the duty to enter into collaboration agreements with other PCCs, other policing bodies and partners that improve the efficiency or effectiveness of policing... in consultation with the Chief Constable and that the Chief Constable is... accountable to the PCC for entering to collaboration agreements with other Chief Constables, other policing bodies partners that improve the efficiency or effectiveness of policing...* In these circumstances there is a mutual requirement for both PCCs and Chief Constables to ensure appropriate representation at the national level and the Chief Constables' Council is the obvious operational focus. The creation of the APCC general

meetings and working groups may have the potential to develop a commensurate national perspective to PCCs and this appears set to develop further.

The role of employer

Operational effectiveness has historically been linked directly to ACPO's remit to act as the professional voice of the service. As has already been highlighted the changing landscape means that much of this will now be taken on by the College of Policing. Once again there are aspects of this function which are not well defined, but which must remain the responsibility of operational commanders. It is already recognised that Chief Constables will wish to retain a forum where they can influence the sharing of best practice, coordinate resources, and respond to national consultations on operational matters. The need for an effective forum for common approaches to employment matters has also been covered. But there is a tension in the British approach to policing between empowerment of officers on the front line and the need for command and leadership of complex, large scale or institutional challenges. Command and leadership has to be exercised in a more subtle way than they might be in a more formal hierarchy since there is a recognised practice of derogation at every level, if an officer believes that the instructions being given are not in the best interests of the maintenance of law and order then they can be disregarded. This does not remove the requirement for collective leadership and it is important to sustain sufficient and appropriate influence at each level in the chain of authority. The position of individual Chief Constables is clear, and their authority has been reinforced through the relationship with the PCC. However their responsibility to lead a force across all its disciplines (operational, managerial and behavioural) needs to be reflected at the national level, it is in effect a forum where the role of the 'boss' can be reflected. This should not be confused with the role of CPOSA which, as a staff association for all Chief Officers plays its part alongside the Police Superintendents' Association and the Police Federation.

Are the outputs effective?

Governance and accountability

There are a variety of governance mechanisms in operation across the full range of ACPO's functions; this is largely because structures have evolved over time, and pragmatic decisions have been made

¹³ ACPO Business Case, Annex A, 6.2

to address new requirements. Now that there is a further phase of extensive change it is not surprising that there are inconsistencies. Frustrations have been expressed over such matters as the lack of transparency of funding, the inadequacy of audit and performance monitoring and the ownership of media lines; these arise out of ACPO's undoubtedly complex and unorthodox structure.

The governance of NPoCC may provide a partial signpost to the requirement. Its Oversight Board is made up from representatives from the PCCs, Home Office, Cabinet Office and the HMIC. It is chaired by the President of ACPO who has a requirement to maintain close links to the Chief Constables' Council. This model demonstrates stakeholder scrutiny through the Board, financial scrutiny through the Home Office and operational scrutiny through ACPO. However, somewhat strangely from a military perspective NPoCC does not have the authority to direct, a capability that may become essential in a crisis. This makes the leadership role even more important, it requires a senior and operationally experienced figure who can command the respect of individual Chief Constables.

The governance of other national units is diverse. Some use a lead force model, some have bespoke Boards, some already answer to the College of Policing and some answer to Business Area Heads. In a number of cases it has proved difficult to obtain clarity on the mechanisms for audit and performance monitoring. It is not suggested that there should be a template solution for the governance of these units, but it should be possible to make some adjustments to the existing structure in order to provide clarity. Great efforts are being made to adapt, but since both the baseline and the requirement are difficult to identify there is a risk that changes are not properly synchronised across the service.

There is no doubt that application of operational experience and leadership requires a focus at the national level that can consolidate Chief Constables views and, and much as possible, achieve consensus. This is currently conducted by ACPO as an empowered agent of the Chief Constables' Council. But there are some anomalies. The process does not appear to give sufficient priority to achieving consensus among such a large and diverse group of Chiefs. There is a sense that for pragmatic reasons there is an inner core of more experienced Chiefs who have greater influence, and this causes some to sit back and let other views prevail. ACPO's further evolution should address the process that supports the Chief Constables' Council giving greater emphasis

on full participation members of the Council. It is also unusual that the governance process of ACPO is driven by its status as a company limited by guarantee rather than the representative of a national institution. Once again this has evolved as a pragmatic response to challenges at the time, but in today's changing landscape it looks increasingly out of place. Attempts to make this more representative by appointing non-executive directors on the ACPO Board do not address the core requirement to ensure that decisions made by ACPO (or the Chief Constables' Council) are in the best interests of the public, rather than the more particular requirements of a commercial organisation.

The National Business Areas are critical to effective policing, but they are largely constructed by informal arrangements and goodwill at every level in the service. Great care has to be taken not to upset this arrangement by implementing changes that are unsustainable. However the current arrangements are difficult to follow. There is a need to define clearly where the responsibility lies for handling and prioritising subject matter. Both the College of Policing and Chief Constables' Council have a direct interest in the output from the Business Areas. As the responsibilities and capability of the College of Policing matures, and in particular the Professional Committee, so there will be a need to develop effective procedures that ensure the engagement of Business Area Heads with operational leadership at a level above individual forces. There are other areas that cause some concern: the mechanism for appointing Heads is not defined clearly, nor are the full range of their responsibilities. For example the formation of portfolios and working groups is pragmatic and needs based, but there does not seem to be a similarly effective mechanism to disband groups when they are no longer required. The practice of letting costs lie where they fall is again pragmatic, but it lacks transparency. Any exercise to quantify the costs of the Business Areas will be a complex and costly. If it is to be undertaken it must be done so with care. However, the governance of Business Areas is important and will benefit from further clarification.

The governance of ACPO's media capability is fragile. It is not a Business Area in its own right (it sits in the Presidential Business Area), and yet it has the potential to influence across the widest range of subject matter. It is led by a Chief Constable in a voluntary post with support from ACPO Central. The requirement was reviewed internally in 2012 and it was agreed that a small national office empowered an authoritative voice from forces

and provided good value for money for work which would otherwise fall locally. It is clear that having a central resource does ensure that there is a degree of unanimity in the positions adopted in the media which would not otherwise be the case. This capability is also important to the public since it supports the police commitment to openness, accountability and transparency, and fills a gap that would otherwise exist above local policing. It appears to be constitutionally appropriate to give the police senior leadership the ability to communicate with the media. However, at present accountability is not clear, and the mechanisms used to develop 'lines to take' do not appear to be sufficiently refined to ensure that they can keep pace with a fast moving environment while at the same time remaining representative of the majority membership of Chief Constables' Council. This highlights a requirement to improve internal communication mechanisms possibly through the use of web-based technology, social media and video conferencing, which could be used more vigorously to bring Chief Constables together more regularly. The objective should be to generate a higher level of collective situational understanding among all of the members of the Council.

One further area that has raised concern is the commercial relationship between ACPO and CPI and, to a degree, AVCIS. This will require careful handling, since there will be legal and commercial interests at stake. But this should not be a strategic driver in the analysis and decision-making process. Further work will be required to consider options but there does seem to be some scope to merge the commercial structures of ACPO Central, CPI and CPOSA without impact on the future options for ACPO.

Value for money?

One of the driving factors in the Government's reforms has been the need to support better value for money in local policing and save on back office and operational support functions. PCCs and Chief Constables have taken up this challenge, and the catalyst for this report has been to examine whether PCCs are getting good value for the £3.3m that they invest in ACPO. It has been difficult to identify an unambiguous position due to the many changes that are in progress. However, the contractors have identified a 'snap shot' position of the PCCs' financial contribution to ACPO which is recorded in detail in their report. There is no doubt that some of the detail of this will be contested, but the findings are sufficiently sound to draw conclusions and make recommendations. The overall breakdown shows that £2.1m is invested in national units and £1.2m in ACPO

central funds. Separately PCCs make a £900k direct contribution to ACRO through a surcharge for the use of PNC.

There are four national units that use PCC funds:

Only NABIS is entirely dependent on PCC funds (£1.665m). NABIS operates as an autonomous organisation, it is not a legal entity and relies on two host forces, West Midlands Police and Greater Manchester Police, to manage employment and staffing as well as IT and transport arrangements. The funding formula is unique and relates directly to the level of gun crime in each force area. Currently funding is routed through ACPO. NABIS was created to overcome Forensic Service costs which charged forces for the number of items submitted. Now through a subscription model, forces can submit any volume of items without additional cost.

The FOI CRU is 90% funded by PCCs (£335k). Any reduction in resources is likely to mean that individual police forces would have to respond to more FOI requests. Business Area Heads would be contacted by multiple forces to advise on requests relating to their specialty rather than one central request from the FOI CRU.

PCCs are a minority contributor to the NWCUC providing 17% of the annual funds (£75k). Although this is a relatively small contribution NWCUC does appear to offer value for money by assisting in the detection and prevention of crime by obtaining and disseminating information from a wide range of organisations and by assisting police forces in investigations.

Lastly PCCs contribute 7% of ACRO's income through a surcharge for the use of the PNC (£900k). ACRO's funding is complex and it is difficult to judge the degree of value for money that this represents. Nevertheless, it appears that forces may benefit exponentially from contributions to ACRO; it is understood that for every £1 invested by PCC, ACRO re-invests £2.50-£3 into services that benefit police forces directly.

It appears that the £3m invested by PCCs in national units does offer value for money. Of course there may well still be efficiencies to be had, but these are best identified through bilateral discussions with each unit. ACPO's role in national unit funding is essentially to pass through costs, there are some economies of scale in shared services, but these are applied inconsistently and are not obviously any greater than would be achieved through a lead force model. ACPO does provide a sensible conduit for the funding, but it does not appear to be essential.

Probably the most discussed area of funding is the 56% of the running costs of ACPO Central (£1.2m) provided by PCCs. The majority of these costs are for staff and infrastructure supporting the President, the Chief Constables' Council, a media and communications capability and the mechanisms to run a company limited by guarantee. Some support is provided to some of the national units and CPOSA, and corporate governance of CPI, but the sums involved are insignificant and should not influence the wider analysis of the requirement. ACPO state that costs are reducing further¹⁴ and it is reasonable to assume that there will be some efficiencies. The wider transformation in the police service mean that it is possible that some of the costs that currently fall to ACPO will transfer to the College of Policing. However, there is not yet a formal transition plan identifying exactly which responsibilities are to be transferred, when it is to happen and where the responsibility will rest.

What are the alternatives?

ACPO has evolved over the years and has been extremely effective at meeting requirements in a pragmatic manner. But there is now a tension between its status as a company limited by guarantee and the need to provide operational leadership. ACPO's governance structures are better organised to meet the requirements of commercial practice, not to answer the complexities of a public institution. The ACPO President has important leadership roles in certain areas, although it is not always clear when he is accountable to the ACPO Board or to the Chief Constables' Council. There is a similar lack of clarity over the responsibility of Board members and whether this is to the company, to the Chief Constables' Council or to the Chief Officer membership. While there is clearly a need for the Chief Constables' Council there are no compelling reasons why ACPO as an organisation is required as a consultative body as it is currently described in legislation. This has to be resolved and is in part why the Home Secretary stated that "ACPO was neither accountable to the public nor able to speak authoritatively on behalf of the whole of policing"¹⁵. Of course ACPO does have specific responsibilities for its own financial accountability and to manage two limited companies (CPI and AVCIS), but these cannot be factors that define the future structure of the police service. Pragmatic solutions to the governance

of these units will be found without the use of public money. The situation is complicated further by ACPO's responsibility to represent the views of all Chief Officers. While CPOSA is an important representative body for Chief Officers, it has limited responsibilities and it is not clear whether these could be expanded to take on more responsibility for presenting the professional views of the membership if ACPO's focus were to shift to Chief Constables only. It may be reasonable to conclude that individual Chief Constables could take on a representative and leadership role for the Chief Officers in their force which would ensure that the professional views of Chief Officers were taken into account.

With such a complicated backdrop the alternatives for the future are not going to present themselves as neat options. Change should continue to be evolutionary and carefully managed and it should particularly focus on developing governance and accountability mechanisms; there appear to be three ways to structure this: through a lead force, through the College of Policing and through the Chief Constables' Council. The lead force is already being used for a number of national units. This model should be the preferred solution, but with governance structures that bring all the interested parties together in the manner of NPoCC. It is also possible that the NCA may also offer the same effect as a lead force, this may not be an immediate priority in their transformation plan, but it would be sensible to consider options concurrently with the implementation of any direction from PCCs. The College of Policing is already taking on some of ACPO's responsibilities and this will continue. The National Business Areas need to be considered separately, they are in effect being hosted by a lead force but the arrangements need to have greater transparency. The importance of the Chief Constables' Council has resonated throughout this report. It is needed in some form and it requires resources to ensure its effective operation. There are three indicative options for its future:

The status quo

Would see the current structures of ACPO continuing to deliver the national requirement. Practices would continue largely as they have in the past. Efficiencies would enable some reductions in cost and disruption might be minimised at a time of considerable change elsewhere. It should be recognised that ACPO is already moving away from the status quo through the production of the ACPO Business Case. However, there are issues of governance and accountability would not be addressed.

¹⁴ The ACPO Business Case shows a reduction in expenditure of £312k in the last financial year

¹⁵ Speech to College of Policing 26 October 2013

Chief Constables' Council

Becomes the core component of national level leadership. This will require the governance and internal communications of the Council to be sharpened so that it is possible to reflect the views of a large body. The Council would need to meet on a more regular basis, operate to a more rigorous agenda and validate the outcomes from its decisions more formally than at present. It is assumed that this model would require a full-time Chair of Chief Constable rank with appropriate levels of support. Concurrently it will be necessary to redefine the linkages with National Business Areas.

ACPO 'lite'

Would represent the outcome if PCCs adopted a more aggressive position over ACPO funding and the senior police leadership was left to sustain itself. In these circumstances there would be pragmatic evolution. It is assumed that Chiefs would continue to meet on their own volition, but the support would be limited and the outcomes less effective. The role of the Chair would become part-time and probably rotational. It is likely that close and transparent connection to the Business Areas would be lost.

The favoured option would be to focus ACPO's attention on developing the Chief Constables' Council. This might have legal and branding implications that have not been studied in any detail in this report.

ACPO's position in law

Neither ACPO nor the post of President are created in statute, but their existence is acknowledged in legislation. Usually this is in the context of duties to consult ACPO before making regulations. Furthermore, section 127 of the Criminal Justice and Police Act 2001 makes ACPO employees eligible for Civil Service pensions, and the Freedom of Information (Designation as Public Authorities) Order 2011 makes ACPO answerable to the Freedom of Information Act. The ACPO President was established as a permanent position in the Police Reform Act 2002 holding the office specifically with the rank of Chief Constable. There is no statutory provision to create a new national body performing the full range of functions of ACPO. Legal advice has been sought by ACPO on the mechanisms that enable effective collaboration between forces and ACPO TAM within the meaning of s.22A of the Police Act 1996 and this may have wider application. However, this report has not sought formal legal opinion and further advice may be required.

The ACPO brand

ACPO's brand is extensively used across the police service. It is often attached to units with a national capability, it has been linked to the output of business areas and it is seen as a representative focus for senior police leadership by the media. Perceptions are generally positive, it is seen as authoritative and, if the brand is to be removed there will be a need for some proactive perception management. This might be done by promoting the College of Policing, but it must also take account of the collective leadership of the police service, possibly linked directly to the Chief Constables' Council. However, as a first impression the loss of the brand should not be considered as a significant factor when seeking alternatives.

Conclusions

The policing landscape is undergoing change of an unprecedented scale. Chief Constables are responsible for the leadership of change within their force, alongside PCCs. At the national level there are a number of initiatives, in particular the College of Policing and National Crime Agency, that have been initiated by Government and are at varying stages of implementation; none of them are yet at full operating capability. Unsurprisingly friction is being generated as the tectonic plates shift, and there is a risk of unintended consequences. The risk is heightened because the transformation of the whole of British policing is not structured as a strategic change programme which would normally be led or coordinated, perhaps in the manner promoted by the Office of Government Commerce (OGC).

The catalyst for this report was the imminent funding decision of ACPO by PCCs for FY 2014/15. However, the terms of reference are more extensive and require an examination of the standing structures and functions currently delivered by ACPO in the context of the radically different national environment of PCCs, the College of Policing and the National Crime Agency. The status quo is no longer feasible, indeed it is evident that steps are being taken to transform ACPO internally concurrently with this report. The requirement is now a measured transformation resulting from a managed process of change which shifts responsibilities over time to the College of Policing and other appropriate bodies, one of which must represent senior police operational leadership at the national level and should be directly connected to the Chief Constables' Council.

ACPO currently provides operational coordination, national policing services and acts as the professional

voice of the service. These outputs are necessary and ACPO has delivered a critical service over many years, but requirements have evolved over time, often as the pragmatic answer to an immediate challenge. Today the output from national units is either governed, funded or supported by ACPO, there is no template solution. Changes such as the introduction of NPoCC have reinforced the requirement for Chief Constables to be collectively involved in decision-making at the national level. But as the wider policing environment changes the governance and accountability of all the national units deserves scrutiny. There are alternative models to ACPO governance, such as the lead force, which are likely to simplify the current arrangement. Overall the intention should be to reinvalidate the bilateral contact between individual forces and national units to ensure individual requirements are met in the most cost effective manner.

ACPO's responsibility to act as the professional voice of the service has been significantly changed by the introduction of the College of Policing, but it has not been removed. There is still a requirement for a central body, at the national level which can provide a forum where Chief Constables as the senior leadership of the police service can offer informed comment and make collective decisions. Both PCCs and Chief Constables need to ensure that there is appropriate representation at this critical point in the hierarchy and the Chief Constables' Council element of ACPO is the obvious operational focus. This forum should have wider responsibilities including the sharing of best practice, coordination of resources, and national consultation on operational matters. Chief Constables also need to consider and, where practical adopt common approaches as employers. Furthermore, and not clearly articulated, the Chief Constable's 'command' responsibility to answer for the collective actions of those in their forces needs to be reflected at the national level. These are not responsibilities that can be transferred to the College of Policing which needs to reflect a broader professional perspective as "the means by which everyone working in policing can have a stronger say in charting the future of the policing profession, driven by evidence-based practice"¹⁶

PCCs have a direct interest in the cost effective operation of National Business Areas even though they are now primarily accountable to the College of Policing. They provide a critical capability to the Police Service, they release a considerable amount of specialist capability and enable the right levels

of professional expertise to be directed at the huge range of challenges that are faced. They are governed on a voluntary basis and resourced by local forces. This is a pragmatic and effective mechanism which needs to be handled with care, but the governance arrangements deserve scrutiny. For example, it is not clear how priorities are established or how Heads exercise authority over some very diverse portfolios and working groups.

ACPO does provide important administrative services, particularly in support of national units. It governs some commercial interests and acts as the home for CPOSA. But these are not factors that should be used to shape the future. They focus on inputs that are not essential to the effective operation of the wider police service, and there will be alternative solutions. Maintaining an effective forum for Chief Constables should be the absolute priority.

Recommendations

Is there a requirement for a collective national policing function akin to that currently fulfilled by ACPO?

There is a requirement for a collective national policing function that focuses on:

- conducting operational and managerial coordination between independent Chief Constables;
- maintaining direct links to the National Business Areas in order to inform policy and implement practice; and
- acting as the focus for command and leadership of the police service.

The current arrangements, are they fit for purpose? How these are delivered; are the outcomes clear and unambiguous; are they best delivered centrally/nationally under ACPO auspices or are there alternative models?

The police service is engaged in a process of transformation, and there are a large number of stakeholder interests involved. If the working group's recommendations are to be effective they need to be considered as a part of the strategic programme that oversees the integration of the collective national policing function with the introduction of PCCs, the NCA and the College of Policing. PCCs may wish to encourage the Home Office to institute a mechanism to lead and manage this change at the strategic level, possibly on the lines of the OGC process.

¹⁶ College of Policing website

Many of ACPO's outputs will endure but they can be delivered in a number of ways. The need for an overarching management structure will continue to be required. Of the three alternatives highlighted in the report it is recommended that a model is developed based on a properly supported Chief Constables' Council, with a full-time chair elected by the membership.

Are the governance and accountability arrangements appropriate and transparent? Is the current funding model(s) appropriate or are there alternative ways of sustaining output which should be considered?

Governance and accountability require attention:

- The governance of national units should be examined in detail and a bespoke solution for each agreed between Chief Constables and PCCs. The evolution to a lead force model provides the preferred solution with the possibility of transfer to the NCA being considered as an option.
- The operation of ACPO as a limited company in its role as the convenor of the collective view of Chief Constables is inconsistent with public accountability. ACPO should be invited to identify an alternative funding mechanism that focuses central funding on the effective operation of the Chief Constables' Council.
- PCCs should seek greater visibility of National Business Area governance and output. The existing mechanism has many advantages and great care must be taken not to undermine it. Even though the overall responsibility for management is transferring from ACPO to the College of Policing the level of resources that Business Areas consume at local level mean that PCCs remain a major stakeholder.

Does the present model deliver the most efficient and effective service and are the public deriving maximum value for money?

The current service costs around £4.2m, the outputs are necessary and, even if they are not delivered through ACPO, are likely to be required in some form. However, there is scope for change to increase efficiency and effectiveness:

- The funding of £3m to the four national units¹⁷ will continue to be required. However efficiencies should be expected and these should be stimulated by bilateral negotiations between local forces and the units.

- The £1.2m invested in ACPO Central is likely to be required by any future model if it is agreed that there is a requirement for the senior police leadership to have a collective representative body. But it needs to evolve. Future assumptions should be conditional on further work to define the re-evaluated responsibilities of ACPO and the Chief Constables' Council.

The sums involved are small in comparison to the total budget; on the condition that PCCs see a commitment to address the output and governance issues raised in this report it is recommended that these funding decisions are passed to individual chief constables to be considered as part of the local force's operational budget. In this way it should be possible to link operational priorities in each force directly to services and effects generated at national level, and remove the funding cliff edge that has emerged for 13 November.

Are the decision making processes efficient and effective and is the correct balance being struck between safeguarding operational independence and achieving appropriate public scrutiny?

It is recommended that the requirement for the senior police leadership to be represented in a collective body at the national level is supported by PCCs. It should be expected to influence debate, act independently and express a view. It will require a capability to communicate with the media. But the mechanism has to be sufficiently sophisticated to generate consensus within the Chief Constables, it must be transparent and operate within the boundaries of government policy. Investment should be encouraged into more responsive internal communication mechanisms. It is recommended that the Chief Constables' Council is adapted to fulfil this requirement, it will require resources if it is to be effective.

¹⁷ NABIS, CRU FOI, NWCU and ACRO

ANNEX A

ACPO independent review terms of reference

Background

ACPO has historically been funded by a combination of Home Office grant and police authority funding and has grown in a piecemeal fashion to cover a diverse range of functions delivered by a range of means. In 2012/13 funding from police authorities became uncertain and the Home Office increased financial support to ACPO to bridge the gap with the proviso that there would be no funding from the Home Office in financial year 2013/14 unless agreed by PCCs. At their inaugural AGM PCCs formed a working group to carry out a review of:

- future role and necessary functions;
- stewardship, management and relationship with policing governance bodies;
- present financial situation and efficient and effective operation; and
- future sustainable funding model based on a commitment to drive costs down.

Review

The working group comprised Jane Kennedy, Mathew Ellis, Martyn Underhill and Simon Duckworth, which made an initial recommendation to APCC members to fund ACPO for the financial year 2013/14. This was accepted at the APCC General Meeting in June 2013. The working group agreed at the same meeting to produce a more fundamental and strategic report for APCC members and has been meeting with ACPO officials regularly since. Engagement has been constructive and the group has received significant support and information from ACPO. During Reference A, it was proposed that given the complexity, gravity and time commitment required, that it would be prudent to expose this examination to professional rigour. It was agreed to commission a report from an independent party to make recommendations for consideration by the working group by October 2013 with a view to presenting it to PCCs in November 2013.

Terms of reference

An independent review is to examine the standing structures and functions currently delivered by ACPO in the context of the radically different national environment of PCCs, the College of Policing and the

National Crime Agency and make recommendations to PCCs on:

- Is there a requirement for a collective national policing function akin to that currently fulfilled by ACPO?
- The current arrangements, are they fit for purpose? How these are delivered; are the outcomes clear and unambiguous; are they best delivered centrally/nationally under ACPO auspices or are there alternative models?
- Are the governance and accountability arrangements appropriate and transparent?
- Is the current funding model(s) appropriate or are there alternative ways of sustaining output which should be considered?
- Does the present model deliver the most efficient and effective service and are the public deriving maximum value for money?
- Are the decision making processes efficient and effective and is the correct balance being struck between safeguarding operational independence and achieving appropriate public scrutiny?

ANNEX B

List of interviews

APCC Working Group: Jane Kennedy, Martyn Underhill, Matthew Ellis and Simon Duckworth

ACPO representatives: Sir Hugh Orde, Peter Vaughan and Sir Peter Fahy

Stephen Rimmer and Emily Miles

Sir David Omand

Sir Denis O'Connor

Tom Winsor, Roger Baker, Stephen Otter and Drusilla Sharpling

APCC Working Group representatives: Tony Lloyd, Sir Graham Bright and Ron Ball

Workshop: Stuart Williams, Iain O'Brien, Paul Brookes, Andrea Jackson and Mark Castle

Keith Bristow

Olivia Pinkey

John Murphy

Mark Sedwill

The Institute of Statecraft

Alex Marshall

Ian Readhead

Christopher Salmon

Paddy Tomkins

Rebecca Lawrence

Nick Gargan

Sara Thornton

Andy Trotter

Bernard Hogan-Howe and Craig Mackey

Simon Hayes

Adrian Leppard

Cressida Dick

Stephen Greenhalgh

Rt Hon Theresa May

ANNEX C

Summary of national units

Unit	Governance	Operational coordination	Requirement setting	Funding	Support services
ACPO Terrorism and Allied Matters (TAM)		Currently exercised by ACPO, through the President			
National Police Coordination Centre (NPoCC)	Reports to the ACPO President	The operational decision-making process at a time of need depends on the direct involvement of the ACPO President and the Chief Constables' Council	NPR collects detail from each police force on their capacity to deal with the major threat areas and then gathers a national picture in consultation with ACPO		Collocated with ACPO Central which provides HR, finance and other administrative support at minimal charge
National Wildlife Crime Unit	Reports to the Head of the Crime Business Area		Referred to the Chief Constables' Council as required	PCCs provide 17% of the funding the remainder coming from DEFRA, the Home Office, the Department of Environment, NI and the Scottish Government	
National Ballistics Intelligence Service (NABIS)	Accountable to the Crime Business Area and is governed by a bespoke management group including a representative from NCA		Referred to the Chief Constables' Council as required	It is wholly funded by PCCs based on a formula linked to the level of gun crime	
FOI Central Referral Unit	It is governed within the Information Management Business Area		Referred to the Chief Constables' Council as required	90% of the unit's funds come from PCCs	
The ACPO Criminal Records Office	Arrangements include a Tripartite Governance Board chaired by the ACPO President; the UK Central Authority reports to a governing body that is chaired by an Assistant Chief Constable with representatives from government, the Home Office and the devolved administrations, and the Head of ACRO reports to the Information Management Business Area		Referred to the Chief Constables' Council as required	Largely from Income and the Home Office, but PCCs pay a surcharge for the use of the Police National Computer which amounts to around 7% of the total cost of the unit	
Disaster Victim Identification (DVI)					It is based in ACPO headquarters
ACPO Vehicle Crime Intelligence Services (AVCIS)					
Crime Prevention Initiatives Limited (CPI)	Entirely owned by the ACPO with the President as the Chair and Chief Police Officers on the Board of Directors			Funded through partnership with companies whose products meet technical standards identified by ACPO CPI. Surplus income is redirected to forces to support crime prevention activity	

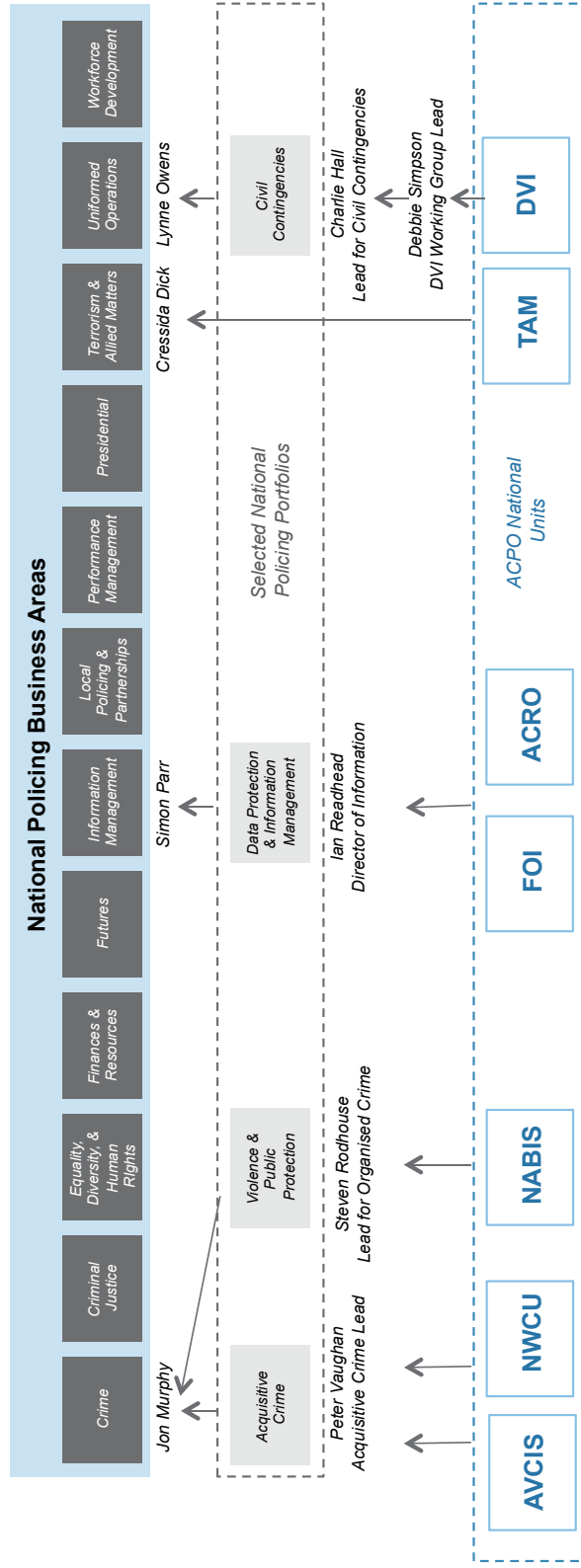
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ACPO

National Policing Business Areas and ACPO National Units



- **Heads of National Policing Business Areas are un-paid, voluntary positions** taken on by Chief Constables in addition to their other duties. Complex Business Areas may comprise a number of National Policing Portfolios and Working Groups focusing on more specific topics
- Heads are **responsible for being the expert in their business area, and for devising national guidelines** for which they seek the approval of the Chief Constable's Council. They also **liaise with other key stakeholders** on this topic (College of Policing, Home Office, HMIC etc.)
- It has been agreed that the work currently done by National Business Area heads in **developing national standards and police practice** are now integrated within the College of Policing
- Generally the **costs incurred** by Heads of Business Areas and their related activities are often **borne by their home force**
- Where relevant, **Heads of Business Areas oversee the work of ACPO National Units falling within their remit**. NPoCC does not fall within a business area (reporting instead to its own oversight board). CPI also does not fall within a National Policing Business Area*



Note: *David Zinzan has been acting as the Lead for Crime Prevention but has announced his retirement and currently no officers are planning to take on these responsibilities
Source: ACPO information, National Unit information, Parthenon calls



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Police Force Contributions to ACPO (2013/14)

Police Force	Contributions to National Units						Total	% of Total
	ACPO Central	FOI-CRU	NWCU	NaBIS	NaBIS Database	ACRO**		
Avon & Somerset	£24,837	£5,943	£1,552	£44,890	£29,724	£78,009	2.39%	
Bedfordshire	£9,795	£2,738	£812	£32,730	£11,528	£10,087	1.20%	
Cambridgeshire	£11,263	£3,146	£703	£26,763	£13,138	£11,757	1.20%	
Cheshire	£16,815	£4,701	£1,051	£18,589	£18,589	£16,265	1.60%	
City of London	£3,888	£807	£0	£32,133	£8,678	£5,643	0.29%	
Devland	£13,627	£3,809	£852	£19,973	£3,878	£11,881	1.14%	
Dumonia	£19,614	£4,955	£596	£20,569	£8,815	£17,141	0.89%	
Derbyshire	£15,014	£4,932	£376	£32,332	£18,104	£15,000	2.54%	
Devon & Cornwall	£23,009	£1,271	£1,626	£51,454	£29,887	£28,151	0.99%	
Dorset	£1,108	£2,346	£569	£21,991	£12,644	£10,859	1.05%	
Durham	£12,754	£5,986	£797	£17,984	£12,644	£11,063	0.80%	
Dyfed-Powys	£7,593	£2,123	£475	£16,381	£5,685	£7,600	2.32%	
Essex	£24,737	£6,915	£1,546	£52,249	£29,674	£25,965	1.07%	
Gloucestershire	£5,265	£2,910	£517	£30,144	£9,901	£5,664	0.92%	
Greater Manchester	£63,714	£17,812	£3,962	£122,599	£66,075	£77,817	5.92%	
Gwent	£11,525	£3,222	£720	£27,956	£12,462	£10,905	1.19%	
Hampshire	£28,912	£9,082	£1,807	£39,122	£33,921	£29,682	2.52%	
Hertfordshire	£16,829	£4,705	£1,052	£20,881	£18,272	£18,272	1.48%	
Humburside	£17,868	£5,001	£1,118	£29,146	£18,453	£16,146	1.58%	
Kent	£26,767	£7,483	£1,673	£20,967	£31,007	£27,132	2.05%	
Lancashire	£28,426	£7,947	£1,777	£50,062	£30,175	£26,404	2.58%	
Leicestershire	£16,400	£4,585	£41,907	£41,907	£18,415	£16,114	1.76%	
Lincolnshire	£8,908	£2,490	£557	£18,580	£10,526	£9,413	0.90%	
Merseyside	£37,262	£10,417	£2,329	£74,327	£37,431	£32,753	3.47%	
Metropolitan Police	£12,211	£3,414	£17,248	£100,000	£301,011	£283,389	18.46%	
Norfolk	£11,181	£3,126	£763	£17,984	£13,818	£12,091	1.08%	
North Wales	£10,695	£2,990	£668	£18,978	£12,233	£10,704	1.02%	
Northamptonshire	£10,509	£2,938	£557	£43,998	£11,931	£10,440	1.43%	
Northumbria	£34,860	£9,746	£2,179	£27,558	£31,549	£27,606	2.38%	
Nottinghamshire	£19,575	£5,472	£1,223	£44,691	£21,406	£18,731	1.98%	
PSNI	£76,747	£21,455	£4,787	£0	£0	£0	1.84%	
South Wales	£25,266	£7,083	£1,579	£18,978	£28,801	£25,202	1.91%	
South Yorkshire	£28,468	£7,959	£1,779	£41,708	£29,040	£25,410	2.40%	
Staffordshire	£16,787	£4,683	£1,049	£28,951	£18,999	£16,625	1.55%	
Suffolk	£9,895	£2,786	£618	£18,978	£11,479	£10,045	0.96%	
Surrey	£14,198	£3,989	£887	£30,741	£18,535	£18,218	1.51%	
Sussex	£23,693	£6,623	£1,481	£21,166	£27,664	£24,207	1.87%	
Thames Valley	£33,158	£9,270	£2,072	£49,465	£40,593	£35,519	3.03%	
Wagwastshire	£7,550	£2,111	£472	£30,144	£9,199	£8,050	1.03%	
West Midlands	£17,001	£4,753	£1,063	£29,945	£19,120	£16,730	1.56%	
West Midlands	£66,917	£18,707	£4,182	£178,688	£72,358	£63,315	7.21%	
West Yorkshire	£46,928	£13,119	£2,933	£76,118	£50,119	£43,855	4.16%	
Wiltshire	£9,094	£2,542	£568	£20,370	£10,738	£9,396	0.94%	
Totals	£1,200,000	£335,468	£75,000	£1,864,936	£1,243,205	£1,087,824	100%	

- Police force contributions to FOI-CRU and NWCU are collected by ACPO Central and then re-distributed directly to units
- Police forces also contribute to ACRO running costs and the NaBIS database via PNC contributions (these units are accorded a share of total PNC contributions)

£1.2m dedicated to operate ACPO organisation. Represents <1% of total PCC annual budget

£4.4M contributed for redistribution to National Units

NB. Actual 2013/14 PCC contributions are slightly higher than those represented here: total contributions to the FOI-CRU amounted to £355,468



Note: *All contributions are determined according to the FSS formula, except NaBIS which is determined by levels of gun crime per local force area
Source: Internal documentation

