Ref: 13/0140

Dear Sir/Madam,

This is a request under the Freedom of Information act. Could you please send me: A copy of the scoping study carried out by the Ministry of Defence and Department of Energy and Climate Change into the possible amalgamation of the MoD Police and Civil Nuclear Constabulary. I understand it was carried out in 2012.

DEPARTMENT OF ENERGY & CLIMATE CHANGE

MINISTRY OF DEFENCE

SCOPING STUDY TO INVESTIGATE A POTENTIAL MERGER OF THE CIVIL NUCLEAR CONSTABULARY AND THE MINISTRY OF DEFENCE POLICE

PROGRESS REPORT

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May 2012

1. SUMMARY

1.1 The possibility of a merger between the CNC and the MDP has been discussed over several years. Compared with other UK police forces, the CNC is a small force but is expanding to meet an increased requirement; the MDP is a medium sized force but is reducing through an efficiency program. The two forces share an objective to protect nuclear sites and material, although the MDP has a number of other policing roles. Both forces are mainly armed and are distributed around the country. A merger would aim to take advantage of these similarities to yield savings from greater efficiency, especially from the combining of

back-office and support functions. This review was set up to examine the possibility of merger in greater detail.

Methodology

1.2 The study team has considered four main options:

- maintain current plans, with the two forces continuing as separate entities;
- a merger of the two forces, with the CNC subsuming the MDP;
- a merger of the two forces, with the MDP subsuming the CNC;
- a Strategic Alliance between the two forces which would maintain their separate identities.

1.3 For each of these options the study team examined:

- role, responsibilities and strategic objectives;
- the legal framework;
- governance and regulation, and the security requirement;
- funding;
- corporate functions;
- operational standards and employment framework; and
- operational support issues,

1.4 The team has collected and analysed a large volume of information in relation to the operation of the forces. Firm conclusions have been reached on the legal requirements of delivering a merged force, and good progress has been made in understanding the ways in which a merged force would operate. Some initial analysis has been carried out on the financial costs and benefits of a merger, however the figures included in this report should be considered as indicative only.

Conclusion

1.5 The key finding in this report is that a merger between the two forces would likely have significant costs associated REDACTED REDACTED REDACTED. It is therefore recommended that the forces should move towards a Strategic Alliance, in line with the approach being taken by other police forces in the UK who are seeking to reduce costs. Such an approach would also reduce the potential for a merger to disrupt the programs of reform and cost-saving currently underway in the MDP and CNC, while keeping open the option to merge the forces at a future date.

1.6 The following are the conclusions reached so far in this review:

a. The two forces have many similarities in role, operational standards and in their employment framework;
b. A merger may be feasible and could lead to greater efficiency and reduced costs in the long term. However there could be significant transitional costs;
c. REDACTED REDACTED REDACTED
d. There are significant differences in the forces' governance and funding arrangements and future employment frameworks, and the MDP has a much wider policing role to meet the MOD requirement;
e. Diverse stakeholder interests, from large commercial companies through to highly secure military installations, would have to be accommodated if the forces were to merge. Although resolving this should be possible, the resulting organisational structures, and the information flows within those structures, would be more complex than at present;
f. Planning and implementing a merger would be a significant distraction to both management teams and pose a risk to other activities, such as the implementation of restructuring plans already agreed for the MDP, and the CNC's 'futures' programme looking at new terms and conditions;
g. Creating a Strategic Alliance between the two forces, allowing for the sharing of training, procurement and operational support, while retaining their separate identities, offers earlier realisation of some of the benefits of full merger, and with fewer risks and upfront costs;
h. A Strategic Alliance would allow closer working and a better understanding between the forces and it could be a natural step towards merger in the future.

1.7 This report is an update ahead of a final report currently planned for the summer. Regardless of the decision Ministers take on continuing the full merger study it is recommended that:

a. The CNC and the MDP should provide the joint study team with further proposals for a Strategic Alliance, identifying costs and savings and the likely timescales by the end of the summer;

1.8 Should Ministers wish to continue the merger study to the end of the summer it is recommended that:

b. Management accountants be engaged to assist in this work, either from within DECC or the MOD or through consultancy;
c. The joint study team should develop a benchmark merger option REDACTED REDACTED REDACTED and an outline governance and funding structure.

2. INTRODUCTION

2.1 This note reports progress on work carried out by a joint team from the Department for Energy and Climate Change (DECC) and Ministry of Defence (MOD) at the request of Ministers in the two departments to evaluate the potential benefits (including financial), costs and risks of merging the Civil Nuclear Constabulary (CNC) and Ministry of Defence Police (MDP) into a single force, beyond those that would arise from greater operational collaboration and interoperability and recommend options for an appropriate way forward.

3. BACKGROUND

3.1 The CNC and MDP are two of the very few remaining examples of non-Home Department police forces (the other main one being the British Transport Police) and have similarities in role (a key focus being on protection of nuclear assets), capabilities (both forces are predominantly armed, both have significant dog capability and a capability to operate at sea)[1] and deployment (both operate throughout the UK and, in certain roles, overseas).

3.2 The prospect of a merger of the two forces has been raised previously and in 2009 and 2010 the issue was discussed by the Permanent Secretaries of the Home Office, DECC and MOD. It was agreed that this was a complex subject, that needed to be considered in the context of whether there were wider policing requirements that a merger might help to address. Potential benefits were recognised, but so were the practical challenges.

3.3 During 2011 DECC and MOD completed a joint review to examine the potential for achieving greater operational interoperability between the two forces at nuclear sites. This work confirmed a number of key similarities and synergies between the two forces in relation to the protection of nuclear sites and assets and identified considerable scope for greater collaboration. Work to exploit this potential is continuing.

[1] Although the CNC do not possess vessels of their own.

3.4 Ministers agreed that further work should be carried out to establish whether a formal merger of the CNC and MDP would be a more effective and efficient solution in support of the sites and assets that these forces police. The original Terms of Reference of this work are at Annex A. The scope of this work was subsequently extended and revised dates were set for the submission to Ministers of a Progress Report (31 May 2012) and Final Report (the end of the summer)

3.5 The joint study team comprised officials from DECC's Nuclear Decommissioning and Security Directorate and from MOD's Directorate of Business Resilience.

4. OPTIONS EXAMINED

4.1 The study team has considered four main options:

- maintain current plans, with the two forces continuing as separate entities;
- a merger of the two forces, with the CNC subsuming the MDP;
- a merger of the two forces, with the MDP subsuming the CNC;
- a Strategic Alliance between the two forces which would maintain their separate identities.

4.2 A fifth option could be to merge the two forces as a new body outside DECC and MOD. The lack of any obvious structure for governance and accountability within which it could operate rules this option out within the timescale of this review and it has not been considered further.

4.3 For each of these options the study team examined:

- role, responsibilities and strategic objectives;
- the legal framework;
- governance and regulation, and the security requirement;
- funding;

- corporate functions;
- operational standards and employment framework; and
- operational support issues

4.4 The following sections set out more detail on the options considered by the merger team.

5. Option 1: Maintain Current Plans

This option describes the current state of the two forces and their known plans up to 2015.

Key Figures

	CNC (Feb 2012)	CNC (2014-15)	MDP (Apr 2012)	MDP (2015)
Number of Officers	1018	1150	2958	2462
Civilian Staff	200	290	217 at HQ	207 at HQ
Deployment locations	15	10-15	119	53

	CNC (11-12)	CNC (2014-15)	MDP (Apr 2012)	MDP (2015)
Budget (11-12)	£75.9m	£82m	£165M	£155M
Departmental contribution (11-12)	£1.2M	£0	£137m	£126m
'Back-Office' costs (11-12)	£21m	£24m	£33.5M £20.4M from MDP based services + £13.1M from MOD based services[2]	£21.9M £13.6M from MDP based services + £8.3M from MOD based services

[2] These services include estates management, payroll, bill paying, HR services, legal advice, IT services

Role, responsibilities and strategic objectives

5.1 The CNC has a single core purpose of providing an armed response force to safeguard civil nuclear sites and material, whereas the MDP has a much broader range of policing roles (within which the armed guarding of Defence nuclear sites and material is the major element).

5.2 The CNC has two key roles:

- to defend and protect those sites to which it is deployed, with a view to denying unauthorised access to nuclear material and, if necessary, recover control of any nuclear material which may have been lost to unauthorised persons; and
- the safe and secure movement of nuclear material within the UK and internationally.

5.3 The MDP performs a much wider range of functions:

- support the secure and uninterrupted operation of the nuclear deterrent (armed nuclear policing, nuclear weapons movement and escort);
- support to operations (looking after Service families at home, dealing with theft, police capacity building in Afghanistan);
- protection of defence people, materiel and estate (armed policing of critical sites and strategic assets, fraud and corruption prevention, investigation and asset recovery);
- responding to major defence incidents (nuclear-related, public order and protest, other major incidents); and
- supporting US visiting forces and wider Government policy on a repayment basis.

The Legal Framework, Governance and Regulation

5.4 The two forces operate within separate legal frameworks that give them:

- different arrangements for their constitution and governance;
- a different basis for funding and accountability; and
- different jurisdictions.

There are however similarities in their employment relations provisions and in the provisions that allow each force to work with, or second officers to, other forces.

Constitution and Governance

5.5 The Civil Nuclear Police Authority (CNPA) is a non-departmental public body established by the Energy Act 2004 to secure the maintenance of an efficient and effective CNC. Its members are appointed by the Secretary of State. The CNPA appoints the senior officers, makes provision for the government, administration and conditions of service of the force, reports to Parliament and produces accounts.

5.6 The Ministry of Defence Police Act 1987 set up the MDP, but the Secretary of State in effect acts as the police authority, though he is advised by a Police Committee, with an independent chairman, that provides assurance on the delivery of policing services. Appointment of senior officers, administration, funding and accountability all rest with the Secretary of State.

Funding and Accountability

5.7 The CNPA funds the operating costs of the CNC through charges raised on the operators of nuclear sites and power stations, under the provisions of the Energy Act. A small capital expenditure budget is provided by DECC, though this was always intended to be a transitional arrangement, so is reducing and will not be provided from 2013/14 onwards. The MDP Act contains no funding provisions for the MDP; funding the MDP is a normal part of the MOD budget.

Jurisdiction

5.8 The Energy Act provides CNC officers with the powers of a constable

- at a relevant nuclear site and within 5 km of such a site,
- where nuclear material is in transit; and
- to pursue or detain a person who has removed or interfered with nuclear material.

5.9 The MDP Act provides jurisdiction over defence land, vehicles, vessels and aircraft including such assets used by contractors, and over land where the Secretary of State has agreed to provide MDP services. There is also jurisdiction in relation to persons under MOD direction, over defence contracts and for securing the unimpeded passage of defence property.

The Security Requirement

5.10 The MOD has a process for establishing its security requirements on the basis of risks and threats and then deciding on the level of guarding and policing. The customer at Defence sites is required to outline the tasking requirement of the MDP, which is then discussed with the MDP's Complementing Team who recommend a number of officers to meet the requirement. The size and composition of the CNC at each site is proposed by the site in question and approved by the Regulator, the Office for Nuclear Regulation - Civil Nuclear Security (ONR CNS), taking account of the level of threat which the industry faces[3] and advice from the Chief Constable and the Standing Committee on Police Establishments (SCOPE).

Funding

5.11 The Energy Act, and a Financial Memorandum agreed with DECC, establish the basis for the CNC's funding arrangements. The CNPA is required to recover its full operating costs each year and the majority of its costs are therefore charged to the Site Licensing Companies (SLCs) for the provision of protective security at civil nuclear licensed sites, and the safe and secure movement of nuclear material within the UK and overseas. Site security requirements are approved by the regulator and associated costs are agreed through negotiation between SLCs and CNPA or, potentially, otherwise determined by the Secretary of State. The CNC's operating costs in 2011-12 were £75.9M. DECC meets most of the CNC's capital expenditure requirement, though during 2011-12 some site-specific capital costs were met by Dounreay and Sellafield and from 2013-14 onwards all such up-front

[3] This is established through an annual assessment process involving the security services and JTAC, amongst others, to identify these threats. The MOD undertake a similar process for their sites and these are currently being aligned.

expenditure requirements will need to be met by SLCs. DECC contributed £1.2M in 2011-12 and has a budget allocation of £0.5M for 2012-13.

5.12 The MDP receives a delegated annual budget through the Departmental Planning Round process, which for 2012-13 is around £137M, which includes an element (about 8%) to cover the cost of various corporate overheads (headquarters costs, equipment costs etc). The MDP budget does not contain provision for functions provided by other MOD service providers, such as estates management, payroll, bill paying, HR services, legal advice, IT services etc. The MDP also provides armed policing services on a full cost recovery basis to a number of external customers (e.g. four Critical National Infrastructure sites, US Visiting Forces, the Royal Mint) which equated to around £28m in 2012.

Corporate Functions

5.13 Both forces maintain corporate headquarters with the main functions being similar, including some functions contracted out to commercial suppliers, but the MDP also rely on MOD services generally for a wide range of corporate support.

5.14 The CNC headquarters occupies part of the UKAEA site at Culham, near Abingdon, Oxfordshire, on a lease with a break point in 2016. The site was formerly a Royal Naval airfield. The location has good road and rail connections to London and the rest of the UK. Headquarters numbers total 107 police officers and 170 civilian staff, but these numbers are due to increase with the planned expansion of the CNC (more detail is given in para 5.16 below). Staff costs amount to about £21M a year and around £4.6M is spent on contracted-out support services (of which the biggest items are IT support, telecommunications and repair and maintenance).

5.15 The MDP headquarters occupies MOD land which is a former US Air Force airfield at Wethersfield in Essex, and which would be subject to Crichel Down[4] rules if it were ever to be disposed of. The site provides ample space and a secure location but it is not well served by public transport: 17 miles from Stansted airport, 19 miles from the motorway system and nine miles from Braintree railway station, all on narrow country roads. Headquarters numbers, including the staff at the co-located training centre, total 250 police officers and 216 civilian staff. These numbers are due to reduce to 119 police officers and 207 civilian staff under current plans. The costs of the headquarters functions amount to some £20M a year, plus about £1.2M spent on a multi-activity contract (building services, catering, cleaning etc.) The MOD additionally provides central support on pay, pensions. legal services, bill paying, HR advice, site management and some IT support. An overhead charge of £1,744 per capita is applied to reflect the cost of these services, equating to about £13M.

Operational Standards

Resources

5.16 In Feb 2012 the CNC had 1018 police officers at 15 operational locations (the largest concentrations being at Sellafield and Dounreay) and 200 civilian staff, mostly at the Culham headquarters. Police numbers are planned to increase to 1150 and civilian numbers to 290 by 2015.

5.17 The MDP has 2958 police officers at 119 operational locations (the largest concentrations being the Clyde/Coulport , Aldermaston/Burghfield, Devonport and Menwith Hill) and 217 civilian staff at the headquarters. Police numbers are planned to reduce to about 2500 by 2015 at some 50 locations.

Recruitment, promotion and fitness standards

[4] These rules require parties compulsorily acquiring land give first preference to previous owners when seeking to dispose of it,

5.18 Until recently, recruitment, promotion and fitness standards in the two forces were very similar, and based on the national police template. However, the MDP applied a British nationality requirement for its recruits, based on the need for security clearance for access to Atomic material and to work with US allies. The MDP has not recruited any officers for the last two years, whereas the CNC has continued recruiting and now applies new fitness standards as part of an improved employment framework that is significantly different from that of existing officers. Promotion standards are similar, although the CNC has adopted promotion procedures based on the Integrated Competency Framework developed by the National Policing Improvement Agency whereas the MDP uses a slightly different process accredited for them by Middlesex University.

5.19 Until recently, the CNC fitness standard was the same as the MDP's (and that of the Home Department Police Forces): a Job-Related Fitness Test on entry, no periodic fitness tests for serving officers, but bespoke fitness tests for those wanting to enter more specialised roles.

5.20 The CNC is now in the process of introducing for new recruits a higher fitness standard at entry (the standard recommended by NPIA for Home Department armed response vehicle crews) adapted to meet the specific needs of the CNC. The CNC statement of terms and conditions of employment issued to all new recruits requires that they maintain the fitness standard appropriate to the level to which they are appointed, which will be subject to annual tests.

Employment Framework

5.21 Currently the CNC and MDP apply similar conditions of employment, which are linked to those of Home Department Police Forces, though the CNC's plans for workforce development (the Futures Programme) envisages a structure for new entrants that will diverge significantly from the current model. In addition, proposals made by the Winsor Review of Police Pay and Conditions may themselves lead to significant changes in the employment structure at other police forces.

5.22 The Futures programme aside, CNC and MDP pay is linked to Home Department forces at 95% relativity, a relationship fixed in 1979 by the Wright Committee, which looked at all the non-Home Department forces. A further adjustment is made to pay to reflect the different rates of pension contributions. Overtime arrangements, working hours and annual leave entitlements are very similar between the CNC and MDP. Officers of both forces have a full mobility obligation, but CNC officers additionally have a liability to be away from home for up to six months for sea escort duty. CNC and MDP officers are not members of the Police Pension Schemes: the CNC are members of the UKAEA-led Combined Pension Scheme, MDP officers are members of the Civil Service Pension Schemes; their employee contribution rates are different from one another (but in both cases lower than if they were in the Police Pension Schemes).

Training

5.23 The CNC's main training centre is co-located with the headquarters at Culham. There are also two regional training centres. The training function provides recruit training courses, development courses and courses on first aid, English/Scots law conversion, driver assessments and instructor training. There is some specialist training provided by external providers. The cost of the training function is about £6.1M a year. The CNC currently uses National Rifle Association range facilities at Bisley under a short-term annual review contract and has range facilities at Sellafield and Dounreay. The CNC is currently conducting a full review of firearms training and range requirements to meet the needs of new recruits, and current CNC AFOs based in the South of the UK.

5.24 The MDP's main training centre is also co-located with its headquarters at Wethersfield, where it enjoys ample space, and there are several regional training centres. Use is also made of MOD firing ranges. There are 120 training staff providing over 250 different training courses e.g. specific firearms courses, vehicle driving, dog handling, marine qualifications, forensics, fraud, intelligence, safety and law. There is occasional use of external specialist training courses. Training capacity will be reduced as part of the MDP's restructuring programme.

Operational Support

5.25 The CNC and MDP have arrangements for their operational support (IT, command, control and communications systems, vehicles and weapons) suitable for their role and there is a degree of interoperability of communications with geographic forces.

5.26 The CNC operates an IL3 Windows national WAN with four data centres, 1279 users and 576 terminals, with plans to expand to accommodate 1500 users. The MDP operates a nationwide Windows-based enterprise network at restricted level with approx 2000 terminals and 100 servers, and a limited confidential network plus a variety of stand-alone systems.

5.27 The CNC operates an Airwave secure radio network with four control rooms and 816 terminals. The MDP operates an Airwave system with 22 integrated command and control system terminals and 2250 radios.

5.28 The CNC has a fleet of 134 vehicles (ARVs, carriers, armoured vehicles, cars etc) with plans to increase this number to 164. The MDP has 576 vehicles (221 saloons mostly marked patrol cars, 139 off-road patrol and ARVs, 50 minibuses, some quad bikes and motor-cycles); this number is expected to reduce by between 35 and 50% as part of planned force changes.

6. Option 2: merger, with the CNC subsuming the MDP

This option examines the way in which a merger, with the CNC subsuming the MDP within it, might work, and its implications.

Key Figures[5]

	Budget lines from within which savings could be made	**Costs**
Removal of MDP Back-office costs	£20.4M (MDP costs) + £13.1m (MOD costs) = £33.5M. **NB: Not all of this will be available as savings**	Increase in CNC back-office costs to cope with increase in number of officers
Removal of MDP top level management team	Included in above	
REDACTED		REDACTED
Transition costs (including redundancy, premises and retraining costs)		To be developed. However, previous public sector mergers potentially indicate a cost in the region of £25-75m[6]

Role, Responsibilities and Strategic Objectives

6.1 The CNC would have to adopt a much wider set of roles, responsibilities and strategic objectives than it currently has if it were to take on all the functions of the MDP and may have to be renamed to reflect its new purpose. It is not likely that significant savings

[5] These figures are indicative only and will require further work before offering a full assessment of costs and benefits.

[6] Source: NAO's report (July 2006) into the complex merger of five different regulatory bodies to form Ofcom assessed the cost of merger as at least £80M.

would be realised from splitting the MDP into a nuclear protection element, to be transferred to the CNC, and a rump of remaining policing tasks that would remain with MOD, as this would remove many of the benefits of combining the organisations. Protection of nuclear sites and material for a merged CNC-led force would therefore have to exist alongside functions such as fraud investigation, patrolling Service families housing estates and supporting overseas policing requirements from MOD, FCO and DfID when they arise.

The Legal Framework, Governance and Regulation

6.2 REDACTED REDACTED REDACTED

6.4 This option would require a transfer of funding from the MOD to DECC/CNPA for each Spending Round period to cover the cost of the MOD requirement for civil policing services. A financial transfer of this size may require HMT approval. Identifying and arranging a consolidated transfer of funding from MOD to CNPA for the services that are provided to the MDP by pan-MOD service providers (e.g. Estates Management, Payroll, Bill Paying, HR services, IT services etc) is likely to be problematic. A possible alternative approach to a Spending Round transfer would be for DECC/CNPA to raise periodic charges against MOD for all services provided by the merged force.

Corporate Functions

6.5 A CNC-led merger could base its headquarters at Culham or Wethersfield (or a third site) on the basis of suitability for its business needs. Logistically both Culham and Wethersfield could likely accommodate a slightly increased headquarters function. A merged organisation should, after transition, need a smaller management team and board structures in total compared with two separate organisations. It is worth noting that Essex Police, a force of about the same size as a merged CNC and MDP, has seven chief officers (police and civilian) compared with 10 at present between CNC and MDP, suggesting some scope for reductions in management numbers. Other headquarters functions could be reduced in the same way.

6.6 A merged organisation would need to provide the corporate services currently provided to the MDP by MOD; these are not different in type from those currently provided to CNC, but the scale would be much greater and the new corporate services organisation would have to allow for differences between the two forces currently, such as on pensions and pay and conditions. Although many of these could be gradually aligned, some differences would probably remain between the two workforces (e.g. on pensions) so the merged organisation's corporate services would have to accommodate this.

6.7 It is likely that many of these corporate services would be contracted out, as they are at present at CNC headquarters.

Operational Standards

6.8 Current estimations suggest that a merged force would likely be formed of 3000-4000 officers, a middle-sized force in policing terms, but much more widely dispersed than any of the geographic forces.

6.9 Recruitment, fitness and promotion standards would be determined by the merged force, taking account of its business needs and the needs of its customers, and national policing standards where appropriate. In any such merger there would be a period during which the different elements of the force operated to different requirements and standards, until these could be sensibly aligned. The new CNC fitness standards would potentially exacerbate this challenge as they will move the CNC further away from the MDP's standards. DECC would not consider relaxing the higher standards.

Employment Framework

6.10 A merged force would need to determine pay and conditions of employment that were suitable and that took account of developments in policing generally. Officers and staff transferring from MOD to the CNC would transfer under Transfer of Undertakings Protection of Employment (TUPE) provisions, with their existing pay and conditions. Again, alignment between these conditions and those of existing CNC officers and staff could be pursued over time.

Training

6.11 A merger of the two forces would offer opportunities to rationalise training. Many aspects of training are duplicated currently between the separate training centres of the forces. Both, for example, do recruit training, personal development courses, health and safety, English/Scots law conversion courses, firearms courses and training for dog handlers

and drivers. A single central training centre could be formed. Although this could be either at Culham or Wethersfield (or elsewhere), the MDP training centre at Wethersfield provides a wider range of courses and has ample space available for training activities. It is likely that some of these benefits could also be realised through the Strategic Alliance option.

Operational Support

6.12 A merger, whether MDP or CNC-led, should allow, over time, more economic procurement and maintenance of operational support equipment and enhanced interoperability. When equipment - radios, IT, vehicles, weapons - becomes due for replacement, a merged force would derive benefit from scale and from standardising on type. Again it is likely that some of these benefits could be realised through the Strategic Alliance option.

7. Option 3: merger, with the MDP subsuming the CNC

This option is the mirror-image of Option 2, with MDP leading the merger.

Key Figures[7]

	Budget lines from within which savings could be made	**Costs**
Removal of CNC Back-office costs	£21.8M **NB: Not all of this will be available as savings.**	Increase in MDP back-office costs to cope with increase in number of officers
Removal of the CNC top level management team (incl. CNPA, Command Team and Executive Director)	£500-800K	
REDACTED		**REDACTED**
Transition costs (including redundancy, premises and retraining costs)		To be developed. however, previous public sector mergers have cost £25-75m[8]

Role, Responsibilities and Strategic Objectives

[7] These figures are indicative only and will require further work before offering a full assessment of costs and benefits.

[8] Source: NAO's report (July 2006) into the complex merger of five different regulatory bodies to form Ofcom assessed the cost of merger as at least £80M.

7.1 Unlike the option of CNC absorbing the MDP, this option would not involve a great expansion in the type of work done by the host force, though the overseas marine escort duties would be very different from the MDP's current home waters marine escort function. Protection of civil nuclear material, at sites or in transit, though fundamentally similar to protecting defence nuclear material, would, however, mean conforming to different customer requirements and regulatory standards.

The Legal Framework, Governance and Regulation

7.2 The MDP's jurisdiction is much wider than the CNC's REDACTED

7.3 REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED REDACTED

7.5 An MDP-led merger would probably generate fewer concerns about the sharing of sensitive information, although if a new governance structure were to be established, involving non-MOD members, processes may have to be devised to control access. Arrangements would have to devised that would satisfy the requirements of DECC, the civil nuclear industry and the nuclear regulator. There would likely be discomfort felt by the industry around both the public perception of the military guarding civil nuclear sites, and the fact that the MOD might be felt to be in charge of the security arrangements.

Funding

7.6 The merged Force could sit within the MOD Head Office and Corporate Services budgetary structure, with CNC officers transferring into the MOD. The provision of protective security at civil nuclear licensed sites, and the safe and secure movement of nuclear material within the UK and abroad, would become part of the MDP's existing external business portfolio with each SLC being treated as a separate repayment customer. This option would require full cost recovery from the SLCs and DECC, which would need to include appropriate overhead and support costs.

Corporate Functions

7.7 The main difference between this option and the CNC-led merger option is that there may be some scope for a range of corporate support functions to continue to be provided by MOD. However, there would remain a need for some of these functions to be provided commercially, and, even if MOD's Defence Business Services organisation were willing to continue providing corporate services the new Force may wish to market-test the costs of MOD-provided services against the offer from commercial providers.

Operational Standards

7.8 There appears to be little difference between the approach that an MDP-led merger would take and that of a CNC-led merger. Operational standards appropriate to the new Force could be pursued.

Employment Framework

7.9 Again, there seems likely to be little difference between the approach of an MDP-led and a CNC-led merger. However, the numbers of officers and staff who would need to be transferred into the host organisation would be smaller in this direction.

Training

7.10 Combining training would be similar under both options. However, it is likely that the easy availability of facilities and space at Wethersfield would be likely to have a greater influence on the location to be chosen for a combined facility, notwithstanding its less accessible position.

Operational Support

7.11 Operational support would be similar under both options. It is possible that an MDP-led merger with the Force remaining part of the MOD may allow greater use of the MOD's procurement processes, with some economy of scale benefit in those cases.

8. Option 4: a Strategic Alliance between the two forces

This option examines the scope for a Strategic Alliance, which could be a possible alternative to a merger, or a precursor to it.

Key Figures[9]

	Budget lines from within which savings could be made	**Costs**
Efficiencies	£500k-4M[10]	
Transition costs (including redundancy, premises and retraining costs)		Unknown, estimated at £100-500K

8.1 The two forces have co-operated at a low level for many years, seconding officers from one force to another, making some use of each other's training facilities, having exchange officers in each other's intelligence branches, and conducting some tactical training together. However, their wide geographic dispersal, relatively small numbers and concentration on their own specialised roles have tended to limit the extent of this co-operation. The CNC advised the study team that they had tried at one point to buy into MOD procurement for weapons but that the option was not taken forward.

8.2 Among the 43 geographic police forces in England and Wales there is a growing trend towards the formation of Strategic Alliances, where small forces pool resources for mutual benefit. Examples include 'back office' functions such as HR, IT and transport maintenance, but there are also examples of operational roles being shared, such as air support, motorway policing and investigation of some major crimes.

[9] These figures are indicative only and will require further work before offering a full assessment of costs and benefits.

[10] Calculations are based on the levels of saving being anticipated by Home Office forces taking forward Strategic Alliances, with an assumption that an MDP/CNC Strategic Alliance would only be 50% as effective due to the differences in scale and structure between these and HO forces.

8.3 Such a Strategic Alliance is now being discussed between the CNC and MDP. The Deputy Chief Constables have identified the following areas as the key ones for the Strategic Alliance to focus on:

- Joint Training – including linking up on capital expenditure for range facilities.
- Joint exercises.
- Intelligence sharing.
- Joint procurement of weapons.
- Joint dog training.

8.4 The advantages of a Strategic Alliance, compared with any of the merger options, are:

- retaining the current role focus for each force and enabling them to concentrate on the objectives that are important to their current stakeholders;
- keeping the present arrangements for governance and stakeholder engagement and funding;
- REDACTED REDACTED which would inevitably be a lengthy distraction;
- achieving the same advantages as a merger in relation to improving efficiency in operational support.
- should a merger become necessary in the future for operational or strategic reasons then much of the ground work will already have been done.

8.5 The CNC and MDP have now set up a joint team to develop a detailed proposition for a strategic alliance.

9. Conclusions and Recommendations

9.1 The key finding in this report is that a merger between the two forces would likely have significant costs associated, REDACTED REDEACTED REDACTED. It is therefore recommended that the forces should move towards a Strategic Alliance, in line with the approach being taken by other police forces in the UK who are seeking to reduce costs. Such an approach would also reduce the potential for a merger to disrupt the programs of

reform and cost-saving currently underway in the MDP and CNC, while keeping open the option to merge the forces at some future date.

9.2 The following are the conclusions reached so far in this review:

a. The two forces have many similarities in role, operational standards and in their employment framework;
b. A merger may be feasible and could lead to greater efficiency and reduced costs in the long term. However there could be significant transitional costs;
c. REDACTED REDACTED REDACTED
d. There are significant differences in the forces' governance and funding arrangements and future employment frameworks, and the MDP has a much wider policing role to meet the MOD requirement;
e. Diverse stakeholder interests, from large commercial companies through to highly secure military installations, would have to be accommodated if the forces were to merge. Although resolving this should be possible, the resulting organisational structures, and the information flows within those structures, would be more complex than at present;
f. Planning and implementing a merger would be a significant distraction to both management teams and pose a risk to other activities, such as the implementation of restructuring plans already agreed for the MDP, and the CNC's 'futures' programme looking at new terms and conditions;
g. Creating a Strategic Alliance between the two forces, allowing for the sharing of training, procurement and operational support, while retaining their separate identities, offers earlier realisation of some of the benefits of full merger, and with fewer risks and upfront costs;
h. A Strategic Alliance would allow closer working and a better understanding between the forces and it could be a natural step towards merger in the future.

9.3 This report is an update ahead of a final report currently planned for the summer. Regardless of the decision Ministers take on continuing the full merger study it is recommended that:

a. The CNC and the MDP should provide the joint study team with further proposals for a Strategic Alliance, identifying costs and savings and the likely timescales by the end of the summer;

9.4 Should Ministers wish to continue the merger study to the end of the summer it is recommended that:

b. Management accountants be engaged to assist in this work, either from within the DECC or MOD or through consultancy;
c. The joint study team should develop a benchmark merger option, REDACTED REDACTED REDACTED and an outline governance and funding structure.

ANNEX A

TERMS OF REFERENCE FOR A SCOPING STUDY TO INVESTIGATE A POTENTIAL MERGER OF THE MINISTRY OF DEFENCE POLICE AND THE CIVIL NUCLEAR CONSTABULARY

Background

1. Between March and May 2011, the Ministry of Defence (MOD) and Department of Energy and Climate Change (DECC) completed a joint review to examine the potential for achieving greater operational interoperability between the Ministry of Defence Police (MDP) and the Civil Nuclear Constabulary (CNC) at nuclear sites. This work confirmed a number of key similarities and synergies between the two Forces in the context of the protection of Defence and Civil nuclear sites and nuclear assets and identified considerable scope for greater collaboration and operational interoperability. Following acceptance of a range of recommendations by the overseeing Interoperability Steering Group, work is currently ongoing to develop closer collaboration and operational convergence in a number of business areas.

2. Building on this work, and in the wider interests of seeking to improve the efficiency and cost effectiveness across the public sector, MOD and DECC Ministers have agreed that a joint scoping study should now be undertaken by both Departments to establish whether a formal merger of the MDP and CNC would be a more efficient and effective solution in support of protection of the sites and assets these Forces police.

Aim

3. In order to maintain, and where possible improve, an efficient and cost effective protective policing capability at Defence and Civil nuclear sites, during nuclear transport operations on land and sea and at the non-nuclear sites the MDP protect (including certain Critical National Infrastructure facilities), the Study Team is required to:

- Evaluate the potential benefits (including savings), costs and risks of merging the MDP and CNC into a single Force, beyond those that would result from greater operational collaboration and interoperability, and
- Recommend options for an appropriate way forward for consideration by MOD and DECC Ministers.

Scope & Methodology

4. The Study Team should establish whether a merger of the MDP and CNC into a single Force would result in a more efficient and effective solution in support of security at the sites they currently protect and the transport operations they currently undertake, in addition to the benefits from increased operational convergence identified in the Interoperability Review Report, May 2011. The potential synergies, barriers, benefits (including savings), costs, risks and options for merger should be identified and evaluated to confirm whether a single merged Force would enhance overall operational effectiveness, and generate sufficient long term efficiency savings to justify the identified start up and ongoing costs that would be required to establish a merged organisation. A full assessment of the main risks associated with merger should also be completed by the Study Team.

5. The Team will need to consider a wide range of issues and take account of key stakeholders' views to evaluate whether a merger of the two Forces is worthwhile and achievable and what reasonable timescale would apply to a merger. The Team will need to identify the current position and existing plans for change, building where possible on the work of the Interoperability Review as a baseline, assess the implications of similarities and differences between the Forces. To future-proof the study as far as possible, plans for the future (in steady state) will be used in assessment, where available (so the issues below do not necessarily specify current and future positions). The Team will analyse options, consider where change would be needed, and make recommendations.

6. The scope and timetable of the study were set by Ministers with the aim of providing initial thoughts by Christmas 2011 and reporting by end March 2012. The Study will assess the case for a potential merger of the two forces. It will take place alongside work to assess whether there are armed guarding requirements in other parts of national infrastructure, although these are not expected to be significant in comparison to the existing tasks of the

two organisations. The study will also take into account the fact that the CNC and MDP between them represent a significant national capability in terms of the large number of highly trained authorised firearms officers who could be called on in the event of a changing threat picture or a specific event, identifying issues raised for others to follow up, but detailed work on this is outside the scope of the study. Whatever the future shape of either force, any decisions about merger will not affect this principle. DECC and MOD officials will keep in touch with Home Office and other colleagues across Government as the work develops and will highlight any impact or any choices in proposals for Ministers that could diminish this national capability.

7. It is envisaged that the following key areas will need to be considered, including any interdependencies, although this list is not exhaustive:

- **Role, responsibilities and strategic objectives:**
  - Present position and relevant context.
- **Legal framework:**
  - Legal requirements and issues (including the legal basis for each constabulary, jurisdiction etc).
  - The options for Departmental ownership of a merged Force (i.e. MOD, DECC or other).
  - Consideration of Reserved and Devolved matters.
- **Governance and regulation of the organisation and the security requirement:**
  - External regulation, governance and assurance arrangements (i.e. regulatory requirements, the future Police Committee/Police Authority structure and inspections by Her Majesty's Inspectorate of Constabulary).
  - The implications of having different stakeholders, including private sector industry site licensees.

- **Funding:**

  - How merger would impact on the current and intended future funding arrangements that support MDP and CNC business activities.
  - Costs of merger – who would pay.

- **Operational standards and employment framework:**

  - Policing model, command, control and communications (C^3) arrangements, structures and equipment.
  - Operational standards
  - Training standards and arrangements
  - The requirement for police training facilities (including potential location).
  - Harmonisation of current MDP and CNC Pay and Terms and Conditions of Service, and associated HR policies (including officer fitness, firearms and vetting standards).

- **Corporate functions:**

  - The requirement for Corporate Headquarters functions (including potential location).
  - The requirement for non-uniform civilian support staff.

- **Operational Issues:**

  - The Team will need to take account of the likely progress and outcomes of the ongoing Interoperability work in the context of the evaluation of a full merger.

Key Deliverables

8. The Study Team is required to provide the following within the timescales shown:

- by 31 October 2011, a high level work programme with associated milestones for agreement by the overseeing Steering Group (see below);
- by 31 December 2011, an interim report to Ministers detailing initial findings and thoughts;
- by 31 March 2012, a final report with a recommended course of action for consideration by MOD and DECC Ministers.

Study Team

9. The Study Team will comprise MOD and DECC officials, but will require close support and interaction with CNC, MDP, HO, OSCT, HMIC, HMIC Scotland, NPIA, ACPO SMEs and Office of Nuclear Regulation (Civil Nuclear Security) officials. The MDP and CNC will identify a chief officer to act as the Force focal point with whom the Team should engage on all aspects of the study.

Governance of the Study

10. The merger study will be overseen by the existing MDP/CNC Interoperability Steering Group that comprises of senior representatives from DECC, MOD, HO, CNC, MDP, ONR (CNC) and HMIC, with the addition of HMIC Scotland. The Study team will be required to provide progress reports to the Steering Group as and when required.

Timescale

11. It is envisaged that the scoping study of the case for and against a potential merger will be completed by 31 March 2012.

ANNEX B

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