

THE GOVERNMENT REPLY TO THE FOURTH REPORT FROM THE HOME AFFAIRS COMMITTEE SESSION 2004-05 HC 370

# **Police Reform**

Presented to Parliament by the Secretary of State for the Home Department by Command of Her Majesty June 2005

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# HOUSE OF COMMONS HOME AFFAIRS COMMITTEE: FOURTH REPORT OF SESSION 2004-05

Police Reform: The Government's response

### Introduction

The Government welcomes the Home Affairs Committee's helpful and constructive report on police reform and is grateful to the Committee for the detailed work it has undertaken in this area. Many of the recommendations made by the Committee in its report are consistent with the Government's proposed way forward, which is encouraging.

We particularly welcome the agreement of the majority of witnesses called by the Committee that the overall direction of the police reform programme has been the right one and that much progress has been made, including the embedding of a performance culture in the police service. However, we also agree with the Committee that there is still room for further improvement in a number of areas.

The sustained programme of reform which has been taken forward by the police service and the Government together has undoubtedly delivered real results, and much progress has been made in making policing in this country more effective. Police numbers are at an all time high of over 140,000 – up 13,000 on 1997. There are 6,300 Community Support Officers (CSOs) providing a visible and reassuring presence on our streets, with £340 million being made available by 2007/08 to fund 24,000 CSOs. Overall investment in policing is up 21% in real terms since 1997. There has been a 30% reduction in crime, with the chance of being a victim of crime at its lowest level since the British Crime Survey began in 1981.

But, as the Committee highlights, more needs to be done. Like all key public services, the police service cannot be immune from further changes and continuous improvement. It must adapt to meet new challenges. We want to get the best out of our record policing resources and further reduce crime and people's fear of crime. We want to see a much more responsive police service, with greater public trust and confidence in policing. Simply, we want to make policing more effective still.

That is why we have embarked on an ambitious second phase of police reform. Our vision, as articulated in the November 2004 White Paper, *Building Communities, Beating Crime*, is for continued improvements in policing to help build safety, security and stability in our communities.

The Government also recently published a booklet setting out our vision for revitalized neighbourhood policing for the modern world – intelligence led policing which is capable of dealing with 21st century challenges of crime and disorder, in genuine partnership with local communities. The Government will work with the police and other partners at national and local level to ensure that by 2008:

- every area in England and Wales will benefit from dedicated, visible, accessible and responsive neighbourhood policing teams;
- there are record police resources on the frontline with the equivalent of 12,000 officers being freed up from back-office work;
- there will be 24,000 Community Support Officers (nearly four times as many as now), providing up to 36 million hours a year out in communities to help reduce crime and anti-social behaviour and reassure the public;

- people will know who their local police officers are and how to contact them;
- people will have a real say in local policing issues and setting local priorities; and
- people will know how well their police are doing locally in tackling crime and anti-social behaviour.

Neighbourhood policing remains absolutely at the heart of the Government's forward agenda, as the Home Secretary made clear in his speech to the Association of Chief Police Officers (ACPO) and Association of Police Authorities (APA) at their conference on 19th May. In that speech, as well as reinforcing the overall direction of travel of the White Paper, the Home Secretary set out four key priorities, of which neighbourhood policing was one — not as an end in itself but as a means of reducing crime, delivering far higher levels of reassurance and building stronger and more secure communities.

The Government's other three key priorities are creating a much more responsive police service, ensuring national consistency, and sweeping away some of the inherited anachronisms of how we manage and develop the police workforce. While achieving all of the above, we must also continue to deliver further reductions in crime and improvements in the number of offences brought to justice. Whatever else changes in the way the police service operates and serves the public, it needs to support these fundamental objectives.

The Government has been heartened by the positive and consensual nature of the engagement of all of our major stakeholders in the police reform process. There is now broad agreement between the Government and the leadership of the police service on both the need for and direction of change – as reflected in the White Paper. We believe that the Home Affairs Committee conclusions will contribute to the continuing debate on police reform which the Government is seeking to promote.

Detailed responses to the conclusions and recommendations of the Committee's report are set out below. These are answered in the order in which they appear in the report, with individual recommendations in bold and the Government's responses in regular type.

### Conclusions and recommendations

1. Most of our witnesses agreed that the overall direction of the police reform programme had been the right one. However, the implementation of the reforms has varied in its effectiveness, and this is the focus of our report. Insofar as our witnesses detected a shift between the first and second phases of reform, from a 'centralising' to a 'localist' approach, this shift was welcomed. In the remainder of this report we look, first, at the extent to which the reform agenda is actually driving improvements in police performance, and, second, at some of the specific elements which make up that agenda. (Paragraph 25)

The Government welcomes the agreement of the majority of witnesses called by the Committee that the overall direction of the police reform programme has been the right one.

The Government also welcomes the recognition of the 'localist' approach characterising the second phase of reform. The main thrust of our reforms is to pass power from the political centre to local citizens and communities, to create new democratic accountabilities and scrutiny, and to reinforce the role of elected councillors in local policing. The White Paper establishes the broad framework of local control and accountability but local people will have the common sense

and ingenuity to devise workable local arrangements appropriate to their circumstances. Our communities are diverse and effective local policing must reflect local differences.

The remaining conclusions and recommendations made by the Committee, as set out below, address the implementation of individual reforms. As a result, we will deal with the issue of the effectiveness of implementation in responding to these conclusions and recommendations.

#### Embedding a performance culture

- 2. On the basis of the evidence submitted to us we conclude that a performance culture has begun to embed itself in the police service and that this is widely regarded as a valuable development. However, there is clearly still scope for considerable improvement. Some of the original aspirations expressed when the police reform process was launched have not yet been met in particular an improvement in the crime detection rate. We accept the argument that an overall detection rate which does not distinguish between serious crimes and minor ones has a limited usefulness as an indicator of police effectiveness. Nonetheless, it is still a matter for concern that too few criminals are brought to justice. We welcome the assurances of the Director of the Police Standards Unit that in the second phase of police reform more attention will be paid to improving the capacity of the police to detect crime. We emphasise the importance of the Government's target of increasing the sanction detection rate from 19% to at least 25% by 2008. (Paragraph 49)
- 3. Overall it is right that the top priority should be crime reduction. The success of police reform will in large measure be judged by whether crime rates fall and in particular, in the short term, by whether the Government meets its new PSA target (announced by the Comprehensive Spending Review in July 2004) of a 15% reduction in crime by 2007-08. (Paragraph 49)

Raising police performance has been a central tenet of the police reform process. The Government is committed to ensuring that all communities receive an acceptable standard of policing, removing the unacceptable variations which have been allowed to arise in the past.

As the Committee acknowledges, we have seen a true performance culture starting to take hold within forces, which is intended to continue to drive forward the delivery of policing. The requirements for improving overall policing performance and the work of the Police Standards Unit (PSU) in closing the gap between the best performing forces and others has been key to ensuring high standards of policing and consistent professionalism across the country. During 2003-04, the forces with which PSU was engaged reduced volume crime by 13.3% – twice the rate of other forces in England and Wales – and 3 of the 5 largest reductions in crime across the 43 forces were in PSU's target forces.

By autumn 2005, Policing Performance Assessment Framework (PPAF) data and HMIC baseline assessments will be brought together to form a comprehensive and balanced assessment on the performance of every police force. This will give a clear view to the public about how well their local force is performing and increase accountability. Each component of PPAF will be scored on an Excellent, Good, Fair, or Poor scale, covering the range of policing activity. Importantly, the assessment will also convey a direction of travel, which will mean that a force, and the team that has led it, will receive recognition if it has made significant strides forward.

This is one aspect of a package of proposals contained within *Building Communities*, *Beating Crime* aimed at further instilling a comparative police performance culture in the service, where forces are rewarded with freedoms and

flexibilities for achieving excellence and supported with an appropriate means of engagement and intervention when performance falls short.

Although a stronger focus on performance is now firmly embedded within the police service, there do still remain areas for improvement – in particular, as the Committee highlights, in relation to the detection of crime.

There was a drop in sanction detections rates between 1998/99, when the rate was 22%, and 2003/04, when the rate was 19%.¹ It should be noted that this fall took place in the context of more stringent counting rules in relation to detections, which have increased the numbers of crimes recorded, thus depressing the sanction detection rate. In addition, we are also aware that detection rates vary by crime type – for example, the murder detection rate for 2003/04 was 92% and the rate for violent crime was 47%. Nonetheless, the Government recognises the need to drive up performance in detecting crime across all forces and has made clear its commitment to doing so. It is for this reason that increasing sanction detections is one of the five key priorities in the National Policing Plan 2005-08.

Furthermore, the Government is clear that improving the rate and quality of sanction detections is fundamental to delivering the Public Service Agreement target to bring 1.25 million offences to justice each year by 2007/08. It is estimated that in order to achieve this PSA target, a sanction detection rate of 25% is required (on the assumption that crime reduction goals are also being met).

To achieve that improvement, a major drive has been underway since summer 2004 to both raise rates and also to address unacceptable variations in detections performance between forces. The Home Office Sanction Detections Delivery Plan sets out actions to achieve the increase to 25% covering five main areas of activity:

- (i) Embedding performance management on the delivery of detections
- (ii) Reinforcing communication with forces
- (iii) Capturing strong performance in investigating crime
- (iv) Improving operational performance
- (v) Co-ordinated knowledge management strategy to spread good practice

Work-streams articulated in the Plan include those aimed at ensuring that forces prioritise and maximise investigative outcomes and that officers and other police staff have the best training and the right skills to improve the proportion of offences brought to justice. A great deal of work is underway to help support forces in improving their performance, including targeted support to specific forces. In addition, full operational guidance has been provided to all forces, which is being supported by events aimed at discussing and sharing good practice.

The Committee's report refers to a continued decline in detections performance. However, provisional data indicates that our concerted effort to raise performance is already delivering results, with improvements in sanction detection rates for thirteen successive months to April 2005, when the rate was 20.9%. This represents an increase of 2.2 percentage points since March 2004, when the rate was 18.7%. Current projections indicate that we are on trajectory to achieve a sanction detection rate of 25% by 2008.

<sup>&</sup>lt;sup>1</sup> The Home Office reviews the performance of police forces on the basis of their sanction detection rate. The sanction detection rate is the percentage of crimes for which someone is charged, summonsed, given a caution or other formal sanction.

The Government is clear that securing more offences brought to justice and enhancing the number of sanction detections must not be achieved at the expense of reducing crime. Experience is demonstrating that these objectives can be achieved simultaneously. Nonetheless, monitoring arrangements are in place to ensure that unintended consequences do not result from the effort on sanction detections.

#### Too many organisations?

- There is a strong case for a rationalisation within a single body of many of the functions at present carried out by separate bodies connected with police reform. We accept the logic of the Government's proposal to create a Policing Improvement Agency into which NCPE and other existing bodies will be wholly or partly subsumed. However, there must be clarity about the role of the Agency and its relations with other bodies. It is quite right that HMIC should remain separate and retain its vital independent scrutiny function. We note that the Government is also proposing that the Police Standards Unit should remain separate from the new Agency. It is not apparent from the White Paper whether PSU will retain all its existing functions or whether some - for instance, guidance on practice and coordination of national campaigns - will transfer to the Agency. It is important that there should be a clear and logical differentiation of roles. In particular, responsibility for carrying out short-term interventions in underperforming forces should be separated from the long-term task of improving the overall skills base of the police service. If the two roles are combined, there is a danger that immediate priorities will take precedence over the long-term, year in, year out development of police skills and capacity nationwide. (Paragraph 64)
- 5. We note that in recent years there has been an increasing trend towards centrally directed operations; for instance, in relation to alcohol and drug abuse or anti-social behaviour. Hitherto these campaigns have been directed on an *ad hoc* basis by the PSU. It is not clear at present how this trend will develop or where future responsibility for such operations will lie. (Paragraph 65)
- 6. We recommend that the Government should publish as soon as possible a more detailed elucidation of the proposed future division of responsibilities between the Agency and other bodies including the PSU, and that this should recognise the need to separate short-term from long-term interventions. (Paragraph 66)
- 7. In the light of the criticism we have received that the NCPE *has* hitherto been hobbled by inadequate funding, we emphasise the importance of providing adequate resources for the new Agency. (Paragraph 67)

The police service, the Government and wider stakeholders are committed to working together to support the continued improvement in police performance by greatly reducing the number of overlapping bodies from which police forces receive assistance and to which they are accountable. The Government welcomes the Committee's strong endorsement for significantly rationalising the number of bodies involved in policing improvement into a single National Policing Improvement Agency (NPIA), which represents a real opportunity to change the landscape of policing for the better and secure extensive headcount and other efficiency savings.

The relationship between the NPIA and those wider organisations which will remain outside of the Agency is the subject of ongoing consultation with stakeholders. ACPO and other policing stakeholders have continued to have a strong programme governance role in determining the direction of the NPIA, so

as to ensure that the police service has strong ownership of the work of the Agency. Once these consultations have been concluded, the Government will make public a more detailed prospectus on the role of the NPIA and the effect on the wider policing landscape, as the Committee recommends. In due course, there will also be Parliamentary scrutiny of provisions for the NPIA in a possible Police Reform Bill.

The Committee differentiated the short-term performance improvements derived from PSU engagements from the longer-term aims of the NPIA to improve performance generally. The National Policing Plan 2005-08 stated clearly that the core functions of both Her Majesty's Inspectorate of Constabulary (HMIC) and PSU were separate and distinct from the NPIA. As the NPIA develops its scope and functions, the future direction of the PSU will be subject to further review.

The Committee rightly states that the arrangements for the funding of the NPIA will be of critical importance in ensuring that the Agency can drive change and achieve improvement. The Government will fully scope and analyse the various funding options for the NPIA to ensure that the most appropriate option is adopted and that the level of funding is sufficient to meet the needs of the Agency.

#### Police training

- 8. In spite of the Minister's assurances, the evidence suggests that police training *has* recently been squeezed on budgetary grounds. Such budget-driven cuts are likely to prove a false economy. There is no substitute for continued in-service training which raises skills levels. We recommend that there should be no further cuts in the police training budget unless areas of obvious waste have been clearly identified. (Paragraph 75)
- 9. We share the concern of the Police Federation that police training is disproportionately targeted at the higher ranks. We recommend that the Home Office and ACPO should investigate whether this is the case. It is important that the training needs of police officers at sergeant and inspector level should not be neglected. (Paragraph 76)

Reform of the police service cannot be delivered without the police workforce. As we made clear in the White Paper, the Government is wholeheartedly committed to workforce modernisation. We believe that there must be a change of culture in the service if we are to bring about lasting improvements. Creating a learning organisation, which is committed to developing the skills of all whom it employs, as well as expecting them to commit to their own development so that they can perform better, is fundamental to the achievement of this objective.

The Central Police Training and Development Authority (Centrex) develops and provides training and development opportunities to the police service, related services supporting operational policing and facilities for the provision of training. Centrex funding has been reduced since it was set up in April 2002, but not in isolation. It has been reduced in the context of the overall balance of spending on training and development within the police service. Centrex provides around 12% of the police service's training needs. Given the advent of the Initial Police Learning and Development Programme (IPLDP – the new training for student officers), more training has moved from being delivered by Centrex to being delivered by forces. Money taken from Centrex's budget has, in part, been re-allocated to cover the costs to forces of setting up the IPLDP.

We are keen for Centrex to deliver training and development opportunities to the police service as efficiently as possible. The Home Office has worked closely with Centrex on funding, efficiency savings and managing the impact of reductions in grant-in-aid. Given that foundation training has previously been

delivered in residential satellite facilities belonging to Centrex, there are now further opportunities for Centrex to improve efficiency and to reduce overhead costs associated with those sites, reinvesting savings in Centrex services and in force provision of programmes like the IPLDP.

During 2003-04, Centrex found savings on the delivery of training and development programmes. The residential Probationer Training Programme Stage 2 was reduced from 15 weeks to 12. The Home Office and other stakeholders worked closely with Centrex to ensure that this did not impact on the quality of the training delivered.

The Centrex Board, which includes ACPO and APA members, explored a range of options with the Home Office, including: charging police forces; a 10-week programme; non-residential training; and shift working at police training centres. The most important criteria were to maintain standards within a reduced budget and to provide training capacity to meet force demand. The final decision was taken by Ministers to restructure to 12 weeks. Centrex is satisfied that the changes to the course will result in a more coherent, focused and relevant period of learning for student officers attending Stage 2, giving officers an excellent foundation for their operational duties.

It should be noted that the development of central training capability will become a function of the NPIA in due course.

Paragraph 69 of the Committee's report refers to insufficient training in the area of diversity, which varies greatly between forces. This was identified by the HMIC thematic report 'Diversity Matters', published in February 2003. Following HMIC's recommendations, the Lawrence Steering Group formed a sub-group to oversee the Police Race and Diversity Learning and Development Programme. Amongst the programme objectives was the requirement to provide a nationally consistent learning and development strategy for all forces to apply to their diversity training. The strategy was published in November 2004, based around the National Occupational Standards. Through the implementation of the strategy, Skills for Justice will be maintaining an overview of the quality of assessment to reach national standards.

The Home Office and ACPO have established the Police National Diversity Team, of which Centrex is a stakeholder partner. This team is currently developing the service's response to the Commission for Racial Equality (CRE) Formal Investigation of the police service, and other recent reviews of diversity issues within the service, to follow on from the Interim Race Equality Action Plan for the police service, published in December 2004. The team is supporting forces in devising revised race equality schemes, which incorporate training of all staff on the Race Relations (Amendment) Act.

Paragraph 70 refers to the funding for the National Centre of Policing Excellence (NCPE) and the lack of separation between Centrex and NCPE. Following the instigation of the NCPE steering group – chaired by a member of ACPO and at which the Home Office, Centrex and NCPE are represented – the decision making process behind the prioritisation of professional practice development has been fully monitored and recorded. Each professional practice proposal is considered within a costings model to inform the appropriate application of funds, before forwarding agreed proposals to Centrex.

The Home Office recognises the importance of available and appropriate training for all ranks and staff within the police service. The provision of training specifically targeted at sergeants and inspectors and equivalent police staff managers is currently delivered through the Core Leadership Development Programme. Fully funded by the Home Office, the programme is delivered via e-learning modules and workbooks, and is in the process of being rolled out to all forces. The 16 modules have been developed to provide flexibility towards

different individual's learning needs, thereby maximising the appropriateness of the programme to a wide range of managers. In addition, the Professionalising the Investigative Process (PIP) project is available to develop professional skills amongst various ranks, including those of sergeant and inspector. The Home Office will work with ACPO to consider whether further provision of training to sergeant and inspector ranks is required, recognising the key managerial roles they play and influence they have in fostering a change in culture within the service.

## National Policing Plan and PSA targets

- 10. We welcome the simplification of priorities and greater emphasis on local decision-making in the most recent National Policing Plan. This is clearly an improvement on the two previous Plans. A similar simplification and streamlining of the police-related PSA targets is also welcome. In our report on Home Office Target-Setting 2004, published in February 2005, we give broad support to the Home Office's decision to reduce the number and simplify the content of its targets. We comment that "it is right that national target-setting should be concerned with setting a strategic direction but not to micro-manage matters that are best left to local discretion". We cite the new PSA target of a 15% reduction in overall crime as an example of a "realistic but stretching" quantitative target which can and should motivate towards better performance. (Paragraph 88)
- 11. However, in that report we also comment that if the benefits of flexibility at local level are to be achieved, there is a need "for a real reduction in centrally determined targets that are set outside the PSA framework". (Paragraph 89)
- 12. We believe that it is sensible to involve CDRPs in police target setting... However, in practice setting targets for CDRPs has a direct impact on local police targets. There are two dangers: one is that this becomes a back-door way of setting local targets for the police, and the other is that there is potential for overlap and confusion between the role of the CDRP and that of police authorities in setting local targets. There is therefore a danger of a proliferation of local targets which might undo the benefits of simplification at national level. We recommend that, in addition to the oversight role exercised by regional Government Offices, the Home Office should invite HMIC to monitor the operation of local police target-setting and report on any problems and lessons to be learnt. Any review of target-setting should, of course, take into account the fact that some areas, particularly under-performing ones, may well require more detailed sets of targets than other areas. (Paragraph 91)

The Government has moved to simplify target regimes as they apply to policing and to provide greater flexibility to the police service on which crimes they choose to target. The new target arrangements which flow from the Spending Review in 2004 seek to streamline arrangements considerably. Instead of a range of crime-specific targets, we have set a single all-embracing goal which aims to secure a 15% reduction in overall crime by 2007-08 and more in high crime areas (PSA 1). This will give forces much greater flexibility in terms of deciding how crime reduction is best achieved to reflect local priorities.

This step has been matched by a considerably slimmed down National Policing Plan. The Government welcomes the Committee's recognition of the improvements made in the latest Plan compared to its two predecessors. With its five clear priorities for the police service, the National Policing Plan 2005-08 has a strategic focus, which allows room for the identification of local priorities within the national framework. The Government plans to make future National Policing Plans even slimmer and more strategic, succinctly setting out the direction of policing rather than getting involved in the detail.

The Committee will know that the police reform White Paper, *Building Communities, Beating Crime*, proposed that a wider community safety strategy would be published in 2005, which would build on the findings of the review of the partnership provisions of the Crime and Disorder Act 1998. Any such strategy and the National Policing Plan 2006-09 will acknowledge the benefits of flexibility at local level, while making clear the national minimum standards that local people should expect from their police force, for example in terms of responsiveness, and other services involved in community safety.

As part of the process for delivering the 15% crime reduction goal, the Government is asking each Crime and Disorder Reduction Partnership (CDRP) – involving the police and other partners of which it is comprised – to set its own crime reduction targets in line with the national objective. Placing the responsibility on CDRPs for making an explicit contribution to crime reduction reflects the police service's view that they cannot on their own deliver the required reduction in crime. They depend on many other organisations and agencies to contribute as part of a joint and structured effort.

It should, however, be remembered that the police and police authorities are two of the five 'responsible authorities' that are required for a CDRP. They do not sit outside of partnerships. The police, at both a force and local level, will therefore be actively engaged in the discussions and negotiations on work that their partnership will have to undertake to achieve PSA 1. This should not and will not be something that is imposed on the police by their partnership and will very much reflect the police's own priorities in a particular area. The police are also heavily involved in partnerships' three year crime reduction strategies, which are created following an audit of local crime and disorder and extensive local consultation.

Clearly, of course, there does need to be alignment between targets agreed with CDRPs and those which forces agree with their police authorities. That is why we have stressed throughout the key importance of both force and authority representatives being part of the discussion process at CDRP level. The agreements reached, CDRP by CDRP, are intended to be reached by discussion and consensus, with the full involvement of both forces and police authorities.

Government Offices have an "oversight" role on the performance of CDRPs in their region and are expected to monitor their targets. There is, therefore, a clear role for regional Government Offices to seek to ensure that agreement is reached on an appropriately stretching set of targets and to report back if, in one or more individual cases, they do not think this is the case. But this is a process of discussion and agreement, not imposition. Government Offices have no "oversight" of the police.

The Government does not believe that these target-setting arrangements are overly complicated. On the contrary, they should make local target-setting more effective, bringing clarity about the overall partnership target and the contribution and resource allocation of individual agencies to its achievement. It should also be noted that a CDRP area is co-terminus with a local authority area (Crime and Disorder Act 1998), thus further simplifying arrangements at a local level.

Nor does the Government believe that the Home Office should invite HMIC to monitor the operation of local police target-setting and report on any problems and lessons to be learnt, as the Committee recommends in its report. There are already mechanisms in place which allow HMIC to monitor target setting locally, both in terms of how targets are agreed and their operation. We feel that introducing further monitoring by the inspectorate would involve duplicating existing arrangements, adding unnecessary bureaucracy to the target-setting process at a local level.

In terms of the targets which drive policing at force level, these are a matter for negotiation between chief officers and their police authorities. Clearly, however, they will wish to ensure that these are compatible with the decisions which are taken at the CDRP level and that they take into account the National Policing Plan priorities.

Underpinning these arrangements, the Policing Performance Assessment Framework (PPAF) will enable forces, authorities, partnerships and the Government to track policing performance. PPAF will monitor performance on seven crime measures, thus enabling all involved in police performance to assess relative and comparative strengths and weaknesses and respond accordingly. This supersedes the earlier PSA target on police performance, whilst enabling us to continue to achieve the Government's goal of narrowing the variations in police performance to provide an equivalent standard of policing to all communities.

# Accountability mechanisms

- 13. Home Office research shows that there is widespread public ignorance of the existing police authorities, combined with a desire on the part of the public to be more involved in local policing. The Government should recognise this. We support the principle of greater public involvement. However, we wish to add three caveats:
  - There is no clear evidence that public involvement of *itself* leads to better policing. Better communication between police and public should be a priority, but this does not mean that the public should determine operational priorities. The views of the public should *inform* decision-making but not *dictate* it.
  - There is a limit to how far the limits of local involvement can be defined nationally. The Home Office should avoid imposing an identical consultative structure on every area. Much will depend on the quality of local police leadership.
  - This reinforces the need for local flexibility in setting priorities. It is difficult for the police to engage in meaningful dialogue with their communities if their priorities are imposed on them from the centre. (Paragraph 101)

The Committee highlighted the concerns expressed during the consultation on the Green Paper, *Policing: Building Safer Communities Together*, about whether police authorities were sufficiently visible or accountable to the communities they served and, indeed, whether they were always able to hold their chief officers to account for force performance. The Government responded to these concerns with a number of proposals in the White Paper, *Building Communities, Beating Crime*, designed to improve accountability.

Policing is at its most effective when it is a shared undertaking with the local community and one of the Government's priorities is to ensure that people see a more visible, accessible police presence on the streets and in their communities and understand how to contact their local officer quickly and easily. The Government also wants to make sure that local people play an important role in keeping themselves, their families and their communities safe. That is why we are committed to giving local people a greater say in determining local community safety priorities and building their capacities and opportunities to participate in reducing crime. This is about empowering local communities to make a real difference in their neighbourhoods and towards quality of life. It does not, however, mean that the views of the public will dictate decision-making. Rather, we will encourage closer working between the police, their partners and local people, to help ensure that local resources are targeted more effectively to tackle the issues that really matter to the community.

The Government fully acknowledges that there is a limit as to how far the boundaries of local involvement can be defined nationally. A central theme of *Building Communities, Beating Crime* was to ensure flexibility at local level and the Government is very aware of the notion that "one size" does not fit all. The National Policing Plan 2005-08 reflects this awareness. The Plan set out five strategic outcomes, covering national priorities. These outcomes must be reflected in all forces and police authorities' local plans. However, individual forces and authorities have determined the weight to be given to each priority, according to local need. It will be for forces and authorities to take appropriate action to tackle particular local problems which may not affect other areas in the same way – and which recognises, for example, the difference between policing urban and largely rural areas.

The Government's overall approach can therefore be summed up as fostering the development of a deeper, stronger connection between local communities and the police service. This involves setting the clear overall national framework for policing, within which local policing, which is responsive to local needs, can be delivered to the public.

The Government wants to build clearer and stronger methods of accountability at all levels – neighbourhood/ward, BCU and force – which will genuinely improve policing and its responsiveness to communities, without adding bureaucracy and complexity. We intend to further explore how to achieve this objective, including giving consideration as to how to bring greater clarity and transparency to the "tripartite" system.

#### Future of the 43-force structure

14. From the evidence we have taken it is clear that there is little appetite within the police or within the wider community for a major structural upheaval or for large-scale force amalgamations. Final decisions on this must await publication of HMIC's review of individual forces' strategic capabilities, but at present it looks as though the sensible way forward is through the development of a limited number of 'lead forces', who will develop particular specialist expertise and share this with neighbouring forces. However, further elucidation is needed of the way lead forces would operate....We recommend that the Home Office should issue clarification of funding and accountability mechanisms for lead forces, and an assessment of their implications, beneficial and otherwise, for smaller, neighbouring forces. (Paragraphs 110 and 111)

As the Home Secretary made clear in his speech to the ACPO/APA conference on 19th May, the Government is prepared to contemplate reshaping the national policing landscape. There are a number of strands to this, of which one is national consistency – the dangers of a lack of coherence were highlighted in the Bichard Report. Another is the issue of structures, on which the Committee has rightly focused in its report.

The restructuring of policing in England and Wales has already begun with the advent of the Serious Organised Crime Agency (SOCA). The question of whether the existing 43 force structure is the right one for our current policing environment also needs to be addressed.

HMIC's initial assessment of protective services has concluded that our present structure is not fit for purpose in some key respects. The Home Secretary has asked Sir Ronnie Flanagan to advance the work which HMIC have been undertaking and to provide, by July 2005, his professional assessment of where the key weaknesses are and how these should be addressed. The Government will, in parallel, be looking to the police service to advance ways of making force collaboration and cooperation more effective.

The development of lead forces is one of a range of options under consideration but the Government does not believe that this is necessarily the only or the most appropriate way forward. We will want to give full consideration to all of the options – including options for changes to the existing structure of forces – in the light of Sir Ronnie Flanagan's further report.

The Government also believes that there is a strong case for aligning BCU and local authority boundaries in order to enhance partnership working in relation to policing and community safety. Tackling crime and anti-social behaviour and building safe and secure communities is a joint enterprise, involving a range of agencies working in partnership. One of, if not *the*, central partnerships is that between police forces and local authorities. This critical partnership cannot operate effectively if the two sides are working across different administrative boundaries – something which is already recognised by the great majority of chief officers. We have made great strides in recent years in ensuring that the various parts of the Criminal Justice System directly map onto each other, including by adjusting the boundaries of the Metropolitan Police. However, while significant progress has been made in aligning BCU and local authority boundaries, the process has not been completed.

The Government is pursuing the issue of co-terminosity in discussion with ACPO and the APA in order to ensure that forces and their key stakeholders can work as effectively as possible together.

#### Police bureaucracy

- 15. There is a strong public desire, which we support, for more police officers to be returned to the beat. Good progress has been made in implementing some of the recommendations of the Bureaucracy Taskforce. In particular, the use of fixed-penalty tickets has played a significant part in freeing up police time. (Paragraph 125)
- 16. However, these gains have been at the margins. There has been too little progress in introducing more effective information technology. It is here that the real potential lies for saving police time and resources. Sir Ian Blair and other witnesses drew attention to the long-standing failure to introduce an integrated case and custody system. There is an acute need for an integrated transmission system allowing the police, the courts and the CPS to communicate electronically with each other. Police officers and staff are entangled in paperwork because they do not have the IT systems they need and want. Redressing this deficiency should be a Home Office priority. We recommend that in its reply to this report the Home Office should supply a detailed strategy and timetable for the introduction of an integrated case and custody system, and should continue to supply us or our successor Committee in the next Parliament with annual progress reports on this project until it has been fully implemented. (Paragraph 126)
- 17. We are also worried by the Minister's definition of 'front-line policing' as including work in the police station on case files and report preparation. These tasks may be essential but they are not what most people would consider to be 'street policing'. Their inclusion therefore skews the statistics and gives an exaggerated impression of the Government's success in returning police officers to street duties. We recommend that the definition of 'front-line policing' should be changed to exclude time spent dealing with paperwork indoors. (Paragraph 127)

As the Committee acknowledges, significant progress has been made in reducing the bureaucratic burdens on officers, thereby enabling them to spend more time in their core roles of tackling crime and providing reassurance to the public. The Government remains committed to reducing the administrative burdens and eliminating unnecessary paperwork and inefficient working practices that keep officers away from the communities they serve – as is reflected in our commitment to free up the equivalent of 12,000 officers from back-office work to the frontline by 2008. We want to empower officers and equip them to provide a more visible and accessible police presence in the community, helping in the delivery of intelligence-led neighbourhood policing teams and responding to the needs of the community.

While undoubtedly good progress has been made in this regard, we do recognise that more needs to be done if we are to eliminate all unnecessary bureaucracy. Much of the reducing bureaucracy agenda is about bringing about a change of culture – partly in terms of the Government changing the way in which it works with the police service and partly in terms of the service itself changing how it works internally. The National Bureaucracy Advisor has played a key role in contributing to the second of these. As the Committee rightly highlights, also of fundamental importance is ensuring that there is proper IT support for every officer in every area, with consistent IT capabilities and standards across England and Wales.

The Government remains committed to an IT solution for the police service's handling of the business processes on custody and case preparation. The NSPIS solution has been delayed and has not always offered the functionality that forces need against the timescales required. Rollout nonetheless will continue to any forces which can gain business benefits from taking it and, at present, 12 forces are using NSPIS products within a total of 23 contracted to take it. An enhanced version 4 is currently available for deployment and contracts for version 5, which will offer further functionality, have been placed with an order for an interface, OMEGA, that will allow a two-way flow of data between the NSPIS products and force legacy systems. Version 5 and OMEGA should be available in the summer of 2005. ACPO has agreed common and objective criteria (minimum standards) that any custody and case preparation system must meet. Work is in hand to test all custody and case preparation systems against these standards and, where there are shortfalls, to identify what needs to be done to remedy them.

The Home Office will provide the successor Home Affairs Committee with a strategy and timetable for the introduction of an integrated case and custody system by late summer 2005. Following this, we will also provide progress reports to the Committee.

With regards to front line policing, we accept the sensitivities that arise with any issue that is perceived to detract from police officers exercising their duties in the community. It was precisely for this reason that we as a Government sought to agree a national measure of front line duties with the police service in 2003. Both in terms of policing in the round and neighbourhood policing in particular we have sought to promote reforms that are about visibility and accessibility. But we also accepted early on that what may legitimately be termed front line policing – including the catching of criminals and the evidence for conviction – can not be restricted to duties visible on the street.

Following up an arrest with clear evidence that will be effective in court should be regarded as a core policing activity. Failed prosecutions or dropping of charges through inadequate gathering, recording and collating of evidence is not what we or the Committee would wish to see. Furthermore, the police have a significant range of powers and they need to account for the exercise of these.

For this reason, the agreed definition of front line policing distinguishes between incident related paperwork and case file preparation on the one hand and non-incident related paperwork on the other. The latter may be important in itself, but is not counted as front line and is unlikely to need a police officer to undertake it. In order to focus paperwork for officers on the evidence they need

to provide, we have also pared down the calculation as much as possible by counting the function of Criminal Justice Units, which administer the process of case file preparation, as non-front line for police officers. We are prepared to look at suggestions for revision of the definition of front line policing, providing these give incentives for core policing activities, can be fed back into the baseline year and can be measured over time.

In terms of freeing up police officers to get back on the streets, we have introduced reforms that allow forces to cut down on the time officers spend in the station post-arrest by the introduction of civilian investigating, detention and escort staff.

#### Workforce modernisation

Reform of police pay, conditions and working practices

18. We congratulate the Home Office on its success in reducing high rates of ill-health retirement and sickness absence. We recognise that it is too early to carry out a full assessment of the effect of Special Priority Payments, which were introduced only just over 12 months ago. In general, we support the greater flexibility they will allow in the use of resources. However, we recommend that the Home Office should address criticisms of lack of uniformity in the process by which SPPs are authorised. In a year's time it should conduct a full assessment of the operation of SPPs. (Paragraph 137)

The Government welcomes the Committee's recognition of the Home Office's success in reducing the rates of ill-health retirement and sickness absence.

We also welcome the Committee's support in relation to Special Priority Payments (SPPs). SPPs were introduced to give forces flexibility to make payments for posts that are hard to fill or particularly demanding. This flexibility includes enabling forces to draw up their own arrangements for administering and authorising payments. Since the scheme's introduction, guidance has been issued that reminds forces of the need to ensure that assessment is simple and unbureacratic. The Government also examines schemes on this basis. We will review the SPP scheme as part of developing options for further workforce reform.

#### Diversity

- 19. The issue of positive discrimination is a very sensitive one. There is undoubtedly a problem which needs to be tackled. Despite recent increases in recruitment from minority ethnic groups, many police forces remain unrepresentative of their wider communities. This is particularly the case in London. Doing nothing is therefore not an option. Equally, it would be counter-productive to take action which led to a lowering of recruitment standards, or which created a widespread sense of unfairness on the part of white police officers. We believe that the best way forward is through a combination of:
  - (a) increased effort put into 'positive action', that is, promotional and outreach activities aimed at encouraging more members of minority groups to apply to join the police;
  - (b) the prioritising in recruitment of certain abilities such as language skills and knowledge of cultural background, where relevant to policing needs in particular areas. A case can be made for doing this on a purely crime-fighting basis. (Paragraph 146)
- 20. We recommend that the Home Office should explore as a matter of urgency the extent to which proposal (b) above can be implemented without a change in the existing law, with a view to issuing guidance to individual forces on how best to modify their present recruitment practices. However,

the position should be regularly reviewed by the Home Office, and if no significant progress has been made, then further action should be taken, including consideration of legislation to enable proposal (b) above to be implemented. (Paragraph 146)

The Government welcomes the clear steer which the Committee has given on the sensitive issue of positive discrimination. We are pleased with the efforts made by the Metropolitan Police Service and other forces to attract more minority ethnic groups into the service but agree there is much more to do. We must create a culture of openness and diversity within which members of ethnic minority groups feel that they are wanted and welcome. If we do not, we will not improve the representativeness of the service, we will not deliver greater public reassurance and we will not maintain the confidence of an increasingly diverse society.

The police service has made considerable progress by removing barriers and opening up to a wider pool of talent. The introduction of Community Support Officers (CSOs) has also made a notable difference to diversity and we need to replicate this success at constable level. But much more needs to be done to ensure forces are doing all they can within the existing legislative framework. We are working with forces to draw on and disseminate good practice and to promote the police service through a range of highly targeted marketing and campaigning activity and materials. We are also considering what more can be done to target minority ethnic graduates.

Forces with dedicated outreach workers and strong networks, such as South Yorkshire and Lancashire, are beginning to see the rewards of their efforts. This outreach activity is also helping to build the trust and confidence of minority communities. We will consider how we might extend and improve this activity in every force.

Whilst one of the challenges is to attract sufficient numbers of talented black and minority ethnic (BME) officers, the other challenge is to appoint them speedily where they are most needed. We agree that there is no case (or support) for lowering the standards to increase recruitment of BME officers. In fact, there is some evidence to suggest that raising the standard at our assessment centre may lead to proportionately more BME officers.

We agree that the police service should be able to prioritise the appointment of individuals who have passed the assessment centre and who have relevant, additional skills, abilities and knowledge which are operationally desirable and which can be used to provide a better service to communities. We are therefore taking urgent legal advice to determine whether this can be done within existing legislation. We will provide further advice to forces on this as soon as possible.

Although not specifically mentioned by the Committee in its report – but still on the subject of diversity – more also needs to be done to increase the representation of women within the police service. The culture of openness and diversity to which the Government is aspiring must make women feel wanted and welcome within the service, as well as ethnic minority groups. It is not acceptable that there are fewer women officers of ACPO rank now than there were seven years ago. The Government is committed to reversing this trend of decline and to ensuring that women are much better represented throughout the police service. This is one of the aims of the recruitment efforts described above. In addition, the Government is planning to review targets for the recruitment and progression of women in the autumn.

21. We support the view of ACPO and the Government that membership of the BNP and similar racist organisations is incompatible with being a police officer, and look forward to this restriction being made legally enforceable. We believe that formal restrictions should be complemented by a determined effort to root out unacceptable attitudes. (Paragraph 148)

People with racist or other unacceptable attitudes have no place in the police service. The ban on police membership of the BNP and similar organisations was implemented through Regulations on 1 January 2005. Police staff are also barred from active membership of the BNP and other similar organisations whose aims, objectives or pronouncements are incompatible with the promotion of race equality and good race relations.

The Government is determined to root out racism and other unacceptable attitudes from the police service and will be considering carefully the Commission for Racial Equality's (CRE) recommendations in relation to the behaviour and training of officers (including the need for confidential reporting systems) and screening of applicants. We will also be considering further the recommendations arising from the Morris Inquiry and the Taylor review of police discipline.

The Home Office accepts it has a lead role in embedding race equality in the police service and is working very closely with ACPO and the APA to do so. A joint Home Office/police team has been set up to drive the work forward. This approach was welcomed by the CRE.

#### Career breaks

We have no reason to believe that there are any major problems with the current system of police career breaks or that a full-scale review is called for. A limited use of career breaks, subject to the overall demands of the service, helps to motivate and retain staff, However, we note that HMIC describes individual force policies as being "likely" to contain "specific information in respect of criteria and eligibility for a career break and also court commitments", and that "in some cases [our emphasis] this includes an undertaking by the individual concerned to advise of any known impending court commitments and to attend any court commitments as required". The implication is that some forces do not require officers on career breaks to give undertakings in respect of court commitments. We recommend that the Secretary of State's national policy on police career breaks should be amended to make it a requirement that all individual force policies should contain stipulations in respect of court commitments following the model of the Metropolitan Police's policy, which we cite in paragraph 152 above. (Paragraph 154)

We will progress the recommendation on career breaks and court commitments through the Police Negotiating Board.

#### 'Civilianisation'

23. We support the Government's intention to merge the pay and conditions of police officers and staff. There should be a single police service pay spine up which individuals will progress according to their skills and experience. However, we recommend that the office of constable should be retained. (Paragraph 159)

The November 2004 White Paper, *Building Communities, Beating Crime*, sets out a framework for developing further workforce reform for police officers and staff. It makes clear the importance of the legal status of the office of constable. We note the Committee's recommendation on a possible pay system. Further pay reforms for officers and staff must support the operational requirements of the service, take account of the changing requirements of police roles and reflect in the right proportion the demands of the role, skills and performance. We will continue to develop workforce reform, including options for pay systems, through the Police Negotiating Board and the Police Staff Council.

#### Community Support Officers

24. It is clear that Community Support Officers have proved popular with the public in their role as high-visibility patrollers. The Government's proposed expansion in CSO numbers was supported by most of our witnesses, though not by the Police Federation which represents uniformed officers. Several witnesses made the point that CSOs are most useful when they work in close liaison with police officers, and that any extension of their powers which reduced their street presence would be counter-productive. We agree with this assessment. We also think it is desirable that individual police forces and police authorities should be given the flexibility to decide for themselves whether they wish to spend extra resources on CSOs or on other personnel or activities. We recommend that the arrangements drawn up by the Home Office for the proposed neighbourhood policing fund should make allowance for such flexibility, allowing local communities to take decisions in the light of local priorities. (Paragraph 172)

The Government sees neighbourhood policing as key to ensuring mainstream local policing services are driven by neighbourhood and community needs. We accept that it is those who are actually affected by problems of crime and disorder who are often best placed to identify solutions for their area, helping to cut crime, make neighbourhoods safer and build greater respect in communities.

What we have done in Government is to provide resources (and promise more) and to work with the police service to deliver our commitment of a neighbourhood policing approach across all forces by 2008. We want every to community to benefit from dedicated, accessible and responsive neighbourhood policing teams, led by regular police officers and involving special constables, Community Support Officers (CSOs), volunteers, neighbourhood wardens and others too.

This approach, which we believe is in line with the Home Affairs Committee's view, is set out more fully in our booklet, *Neighbourhood Policing – your police;* your community, our commitment, published on 9 March 2005. Numbers, staffing mix, skills and powers will need to be appropriate to the particular needs of the neighbourhood and we have not sought to prescribe a one-size fits all approach.

By 2005/6 we will have increased Government supported spending on policing by 26% in real terms since 1997. We are setting aside additional money to support the increase in the numbers of CSOs, rising to £340 million in 2007/8. Research findings from forces show that CSOs are having a real impact in providing reassurance and making local communities safer places to live and work. However, the expansion of neighbourhood policing is not solely about CSOs, nor will it be funded solely from the Neighbourhood Policing Fund. It will also involve forces refocusing their activities on local communities. General grant and local partners – local authorities, businesses and others – can (and already do) play their part. We will discuss with stakeholders (ACPO and APA) opportunities for flexibilities, but we have made it clear that one of the key objectives of the fund is 24,000 Community Support Officers in 2008.

This growth in CSOs will not be at the expense of officer numbers – the Government will carry on funding the service to enable it to continue to employ historically high numbers of police officers – but we do not want the constraints of the funding mechanisms to drive forces into making resource decisions which make no sense operationally. The Government would like to move the debate onto the service people are getting, not just the resources we are putting in or the job group of the people who are delivering it.

There is no intention by the Government that CSOs should be anything other than visible on the streets and the powers provided for them in legislation are targeted on the sort of issues they routinely come across when out on patrol.

#### Science and technology

#### Call handling

- 25. We support the Government's proposals to improve call-handling. At present it is often difficult for members of the public to contact the police. This is not acceptable. However, the Home Office must ensure that suitable training and staff resources are made available to ensure that the new systems are a success. (Paragraph 179)
- 26. We also welcome the proposed introduction of a single non-emergency number. We note the concern of the APA that appropriate back-up systems should be in place before the new number becomes available. We recommend that the Home Office should address these concerns in its planning for the new number. (Paragraph 180)

The National Call Handling Standards are a first step towards ensuring improved and consistent service delivery across all forces. Successful call handling is core not only to the satisfaction of users but also to effective investigation of crime and management of intelligence. Improving force call handling will underpin key elements of the National Quality of Service Commitment, which aims to make it easier for the public to contact the police, including through clearer information about how to get in touch for non-emergencies, and will ensure everyone receives a professional and high quality service whenever they contact the police. The National Call Handling Standards will help ensure that people receive a much better service when they contact the police and are confident about getting help quickly in an emergency.

As part of the ACPO-led project on call handling, we are putting together a national accredited training course for force call handlers and supervisors. This will be rolled out to forces from April 2006. The Call Handling Standards will also include a guide for forces on how the demand for calls can be managed.

We are pleased to note that the Committee welcomes the proposed introduction of a single non-emergency number. The Home Office has appointed a Project Director who is now recruiting a small project team. Their main role will be to ensure that a core service is available by the end of 2006, with a full national service by 2008. As part of the rigorous planning that will accompany the development of the service, the Project Team will ensure that suitable back-up systems are put in place.

#### Use of DNA

27. There is great potential for increasing the effective use of DNA by the police. As HMIC has demonstrated, there remains unacceptable variation in the adoption of DNA technology by individual forces. The Home Office and ACPO should push for more rapid progress on the part of under-performing forces. (Paragraph 192)

Nationally the country is the global leader in using DNA technology to detect crime. The number of DNA profiles has increased since evidence was prepared for the Committee. As at the end of March 2005, the Database held just over 3 million DNA profiles (3,000,949). The projection of the number of profiles on the Database by 2007 has increased from 3,700,000 to just over 3,800,000.

More recent figures than were available to the Committee indicate that in 2003-04 the overall detection rate rose from 23% to 43% where DNA had been successfully recovered from a crime scene. In 2003-04 there were over 45,000 'offender-to-scene' matches; over 20,000 'DNA detections'; and an increase of 138% in DNA detections over the figure for 1999-2000.

The Home Office Police Standards Unit and Forensic Science and Pathology Unit (formerly the Science Policy Unit) will continue to work with ACPO to help under-performing forces make full and effective use of DNA.

28. We note the concerns expressed by Sir Alec Jeffreys in relation to police use of DNA and recommend that, as a precautionary measure, the Home Office should consider whether changes in practice are necessary to deal with the potential problem of multiple identities. The Home Office should report to us the conclusions of this review. (Paragraph 193)

The Government notes this recommendation, which concerns a complex area with important ethical as well as scientific issues. Following evidence given by Professor Sir Alec Jeffreys, the National DNA Database Strategic Board's Custodian, Dr R K Bramley, is to convene a meeting between Professor Sir Alec Jeffreys and other scientists to discuss the issues with a view to producing a joint paper for consideration by the National DNA Database Strategic Board. The Government, which is represented on the National DNA Database Strategic Board, welcomes this initiative and will carefully consider the contents of the joint paper.

29. We welcome the Forensic Integration Strategy, aimed at integrating all forms of forensic evidence by 2008. We recommend that in its reply to this report the Home Office should supply us with an update on progress in implementing the Strategy. (Paragraph 194)

The Government welcomes the Committee's endorsement of the Forensic Integration Strategy (FIS). Agreement has been reached with ACPO to take forward the Strategy in a manner that increases the input of police officers and Scientific Support Managers in decision making compared with the arrangements for the DNA Expansion Programme. For the period 2005-06 the Home Office, with the agreement of ACPO, has identified the following key work streams:

- (i) Fingerprints: The Home Office is funding a project management team to oversee arrangements for the rollout of a national procurement and standard operational procedures for Livescan. It will also take forward developments with another pilot project into the electronic transmission of marks from crime scenes. The objective is to enable police officers in all custody suites to confirm the identity of individuals more quickly, for example, persons using an alias because they are being sought under any arrest warrant.
- (ii) DNA and International Workstreams: Continuing investment introduced via the DNA Expansion programme of £51.5millon will be spent on DNA analysis, police force forensic capacity and National DNA Database services. The Government aims to use its Presidencies of the G8 and EU to seek to encourage greater transnational exchange of DNA intelligence to more quickly identify and arrest criminals who commit serial offences in more than one country.
- (iii) Procurement Reform: The Home Office is working with ACPO and the APA to develop and implement a new procurement strategy for forensic science purchase by the police. The strategy moves is intended to achieve greater value for money in a £200 million plus market.
- (iv) Forensic Pathology: The Home Office, in collaboration with the Royal College of Pathologists, has introduced new 'codes of practice and standards' for forensic pathologists. A new IT system has been developed and will come into use shortly in order to

support a comprehensive quality system. £3m of funding has been committed for improvements to forensic mortuaries, with a further £6m available for 2005/6. Twelve trainee forensic pathologists and conversion programmes for four consultant conversions are being funded in the current year.



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