



House of Commons
Home Affairs Committee

**College of Policing:
three years on:
Government and
College of Policing
responses to the
Committee's Fourth
Report of Session
2016–17**

**Fourth Special Report of Session
2016–17**

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Home Affairs Committee

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Publication

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Committee staff

The current staff of the Committee are Carol Oxborough (Clerk), Phil Jones (Second Clerk), Harriet Deane (Committee Specialist), Adrian Hitchins (Committee Specialist), Kunal Mundul (Committee Specialist), Andy Boyd (Senior Committee Assistant), Mandy Sullivan (Committee Assistant) and Jessica Bridges-Palmer (Committee Media Officer).

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Fourth Special Report

The Home Affairs Committee published its Fourth Report of Session 2016–17, *College of Policing: three years on* (HC 23), on 9 July 2016. The Government’s response was received on 12 September 2016 and the College of Policing’s response was received on 3 August 2016, and are appended to this report.

In the Government response, the Committee’s recommendations (or excerpts from them) appear in *italicised text* and the Government’s responses are in plain text.

Appendix 1: Government Response

Overview

The Government welcomes the Home Affairs Select Committee’s report as well as the Committee’s clear support for the College of Policing, the professional body for policing.

The College operates independently of Government and its role is clear: setting high professional standards; sharing what works best; acting as the national voice of policing; and ensuring police training and ethics of the highest possible quality. To do this, the College seeks out best practice, supported by evidence. The College also supports forces to improve by conducting peer reviews when requested by force leaders, as evidenced recently in South Yorkshire.

This report is a welcome contribution to the development of the College, the creation of which has been an important pillar in our programme of police reform. Given the College’s independence, it is right that it responds directly to the Committee’s report. The report’s general themes and specific recommendations of relevance to Government are addressed below.

Consistency, standards and Code of Ethics

1. *We agree with Her Majesty’s Inspectorate of Constabulary (HMIC) that it is unacceptable that police forces in England and Wales are failing to embed the College of Policing’s Code of Ethics.*
2. *The College and the National Police Chiefs’ Council must work harder to ensure that the Code is instilled “in the DNA” of serving officers.*
3. *Alex Marshall informed us that the College of Policing does not have the resources to audit progress made in individual forces in implementing the Code of Ethics. The College must set out how it intends to tackle this problem.*
4. *The College must set out what additional steps it is taking ... to ensure that the Code of Ethics is fully embraced by Chief Constables and serving officers so that it becomes rooted in police culture, throughout the ranks.*
5. *We recommend that the Code of Ethics and the Police (Conduct) Regulations are consolidated and made enforceable and that the resulting single document is put under the control of the College of Policing.*

6. *Individual Chief Constables and Police and Crime Commissioners must adhere to the guidance and statutory Codes set down by the College of Policing. ... The Government must set out the steps it is taking to address this failure and promote better compliance.*

Under the reformed policing model, national policing bodies each have specific powers and functions: the College sets standards; HMIC inspects against them; and chief constables coordinate their operational delivery. It is important that these bodies continue to work effectively together to ensure improvements across policing.

The Government welcomes the interest of the Committee in the important area of police ethics and professional standards and shares the Committee's and HMIC's desire to see the Code of Ethics embedded across all forces. HMIC's annual legitimacy inspections, which form part of the PEEL programme, have been a useful tool in assessing how far the College's Code of Ethics has been embedded by forces and have helped to measure whether forces are improving.

Developed by the College, the Code of Ethics is a broad set of principles to support those in policing with everyday ethical decision making. The Code builds upon the Conduct Regulations, which are necessarily specific and prescriptive, by setting out the universal values, beliefs, and attitudes expected from the profession as a whole and all those serving in policing including police officers, police staff, volunteers and contractors.

Amalgamating the code and regulations would undermine the separate purposes that the Code of Ethics and Conduct Regulations serve and narrow the code's application from policing as a whole to the regulated roles of police officers and special constables. The Code of Ethics is a document developed, owned and embedded by the policing profession through the College of Policing; it is for the sector itself to continue to professionalise and consistently embed the principles established by the Code. The Committee rightly identifies that the Code needs to be embraced fully by Chief Constables in order to effect culture change across policing. This will not be achieved by further regulation but by leadership from the sector itself.

For its part, the Government has demonstrated the importance it places on improving police integrity through the overhaul of the police complaints and disciplinary systems. Improving public confidence in the police and these systems is at the heart of the Policing and Crime Bill which is currently before Parliament and the programme of reforms which will follow the Bill's completion.

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7. *We recommend that the College of Policing be given the legal power to hold a register of people who work in policing and responsibility for admitting and striking people off that register and, where appropriate, to license individuals to work in particularly high-risk aspects of policing.*

8. *We also recommend that the College of Policing's power to set regulations and standards be extended to civilian staff.*

The Government welcomes the Committee's support for the College's recent proposals for the introduction of a licence to practise. The Government is working with the College to develop this proposal, which would set minimum standards for certain specialist roles

and give the College responsibility for maintaining those standards through a system of national accreditation. This will deliver high standards for specialist investigators, and ensure that these are as rigorously and consistently applied in protecting the vulnerable as they are in other critical areas such as firearms and public order.

The College of Policing already has the power to lay codes of practice for employers (Chief Constables) and set qualifications for professional development requirements for individuals to be deployed to particular tasks (Officers and employed staff). Officials are looking at the legislative requirements for the College to establish, hold and maintain a register of people qualified in particular skill areas of policing which would allow professionals to demonstrate, on an ongoing basis, that they are up to date with their professional development and able to provide a professional level of expertise expected by the public.

While some of the powers the College hold in relation to police officers would not be applicable to civilian staff, for example where setting standards for promotion and recruitment, with an increasingly flexible workforce it makes sense to examine again whether the powers of the College are sufficient in relation to police staff and volunteers. Home Office officials are taking this forward with the College.

Recruitment & Training

9. *There must be a standard recruitment process with standard entry requirements for someone wishing to become a police officer in England and Wales.*
10. *We recommend that police recruitment be centralised and then overseen by an expanded College of Policing.*
11. *We recommend the Government consider introducing a number of regional hubs, overseen by the College of Policing, who would have staff embedded at these training centres.*
12. *As with the Scottish model, we would expect parts of a police officer's training to be delivered locally by the applicant's chosen force, as it is now, but it is our view that there are clear advantages in the initial training being delivered by as few bodies as possible. Training provided by these bodies should also be extended to police civilian staff.*
13. *Any move toward degree-level entry should also have regard to our proposal that the initial part of training for new recruits should be at a central or regional college run by the College of Policing.*

The Government agrees that police forces need to recruit the best and most able people and it is important that the College keeps standards under review in order to achieve this.

The Government believes that police recruitment should continue to be driven by forces to reflect local needs as determined by Chief Constables and Police and Crime Commissioners but within a national framework set by the College of Policing. It is for forces themselves to decide whether to work together on recruitment: there are already a number of forces who have done so on the running of the Police Search Assessment Centres, including Norfolk & Suffolk, Kent & Essex, West & North Yorkshire, TVP & Hampshire, Devon and Cornwall & Dorset. In addition, several forces have sent their candidates to collaborative assessment centres run by the College of Policing at Ryton.

The College has been reviewing initial police recruitment over the past year, including the SEARCH Assessment centre, with a view to improving the process. Results from the review will inform future College standards around recruitment. The review also includes an assessment of a new pilot run by the Metropolitan Police Service (MPS), with College support.

Procurement

14. *As a minimum the College should have an advisory role in the procurement of specialist equipment.*

15. *If we do not see significant improvements in this area by the time we return to this issue in 2017 then we may decide that the College of Policing needs to take on a more central role in police procurement, for example by specifying the standard equipment which forces should be purchasing, in the same way that it sets standards in other areas of policing.*

16. *We call on the Home Office to provide an update on the Collaborative Law Enforcement Procurement Programme (CLEP).*

The Government agrees that greater standardisation of police specialist equipment will lead to efficiencies and savings. This in turn, as the Committee recognises, supports greater cross force operational working as forces are trained and issued with standard equipment. Over the last financial year the police reported £29m worth of savings as a result of collaborative procurement.

The Government can provide a supportive role in this area, however, it is for forces themselves, as the holders of expertise in the relevant specialist equipment, to work together to drive standardisation. It is for the College to determine its own priorities and whether it should develop the knowledge and standards on how specialist equipment should be used in different operational roles.

Progress has been made through the Collaborative Law Enforcement Procurement Programme (CLEP), which is owned by the police. This has driven success in potentially difficult areas such as police uniforms, vehicle purchasing and forensics. Over the past year, CLEP has begun to deliver in a number of key areas which will save the police £12m over the next two years. The Home Office will continue to work with relevant policing bodies to encourage improvement.

Governance

17. *It is unacceptable that the Board of the College of Policing has not been able to increase its ethnic minority representation. ... We expect this to be addressed urgently, together with the skills gaps that have been identified.*

18. *Given the pressures on the College of Policing's budget and the desire on all sides for it to succeed, it seems strange to us that the College is being prevented by Treasury rules from charging what it needs to for the training it delivers. The Government must remove these constraints.*

The Government is clear that police diversity is not an optional extra: it is fundamental to our system of policing by consent. Police forces, led by the College, have made real

improvements in diversity – there are a greater proportion of women and black and minority ethnic (BME) officers than ever before. However, it is clear that there is a great deal more to do. As the professional body, setting standards for forces, it is right that the College should be setting an example.

Since the first HASC report on the College in 2014, the College has undergone an internal board review to consider board composition and the best mix of abilities and knowledge. The College's board composition compares well with other public sector organisations in terms of gender and its age and ethnicity profile is comparable with other sectors. The board is currently 60% female and whilst BME representation is limited to one individual, this is equivalent to 8 % of the board, and is consistent with other sectors. Recruitment to board positions, with the exception of the Chair, is the responsibility of the College and it is for the College to continue to show leadership in driving diversity in policing. The College is committed to commissioning an external review of the board once its new Chair is in post.

The Government is working closely with the College to support it to develop the appropriate set of charging arrangements, which can satisfy the charging requirements set out in Managing Public Money guidance and the requirements of HM Treasury.

International

19. *Deciding whether the UK should enter into contracts with certain countries will involve difficult decisions, and ones which may often be based on factors which go beyond the contract themselves. There must be more transparency in the process and Parliament must not be denied the opportunity for proper scrutiny. It is unacceptable that the College, and the Foreign Office on whose advice the College is required to act, have been unwilling to answer our direct questions regarding the basis on which international assistance is provided. This is particularly worrying given that Freedom of Information requests have already put much of the information in the public domain and the Chief Constable of Police Scotland, Phil Gormley, has been able to provide us with details about its arrangements without hesitation.*

We recognise that there are risks wherever in the world we offer training. It is for this reason that the Overseas Security and Justice Assistance (OSJA) Human Rights Guidance is used to assess all proposals for cooperation with other governments. The OSJA assessments are based on sensitive judgements utilising material such as intelligence and other sensitive reporting. These assessments made by Ministers and officials are generally classified and are not published.

Where information is withheld by the Government, it is not done so lightly and is in line with the provisions of the Freedom of Information Act.

20. *To ensure that there is proper transparency and accountability, the College must be open about the nature of the international work that it provides. As a minimum this must include basic details about the training provided and the risk assessment of the training's potential impact on human rights in the country involved.*

The College of Policing sets standards of practice and is the professional body for those working in policing. In common with other organisations, the College does not routinely publish details of commercial contracts and has no plans to do so. In relation

to international assistance, the College works closely with the Home Office, the Foreign and Commonwealth Office and other partners across government. It provides as much information as possible under the Freedom of Information Act, including the total income it has received from international activity.

The Government agrees with the Committee that it is essential that the potential risk of any training impacting on human rights must be integral to the final decision over whether to go ahead. This is why we use the OSJA process.

All training delivered by the College of Policing is consistent with the British model of policing by consent. Course developers and trainers are required to include a bespoke human rights and ethical decision-making element in each course. Where appropriate they will make reference to the College of Policing's Code of Ethics, College training materials such as the National Decision Model, and internationally recognised standards such as the UN Declaration of Human Rights.

In addition, the College is clear that in line with best practice, it submitted all its international requests to the International Policing Assistance Board (IPAB) to continue its programme in 2014 and again this year. IPAB assesses all requests against British values and interests and comprises policing representatives and those of the Foreign and Commonwealth Office, Home Office, Ministry of Defence, Department for International Development and Devolved Administrations.

21. We also recommend that foreign governments confirm in writing the purposes for which the training will be used and that the UK Government secure a written guarantee that the training will not include any purposes deemed unethical by the UK Government.

The Government takes its human rights responsibilities extremely seriously. All potential activity incorporates human rights protection and is covered by the OSJA Human Rights Guidance framework, ensuring that decisions on all projects and assistance are made at the right level, including by Ministers where appropriate. OSJA assessments cover the full spectrum of serious human rights issues. Whilst there is no blanket requirement for such confirmations from foreign governments, many OSJA assessments do recommend a Memorandum of Understanding or other form of undertaking by the assistance recipient to comply with human rights standards.

The Government welcomes the opportunity to encourage reform in overseas countries through professional bodies such as the College of Policing. It is through this type of cooperation with foreign governments, in the spirit of partnership, that we can support efforts to bring about positive change in countries.

22. We wrote to the Foreign Secretary to ask him to clarify the general policy of approving international contracts. He replied only on contracts with Saudi Arabia despite the fact that we had not asked about individual contracts but general figures such as those provided by Police Scotland. The Foreign Office should not hide behind any relationship with foreign governments under the guise of 'commercial sensitivity'. For a Foreign Secretary to act in this manner and tell the British Parliament that it cannot disclose such important information is totally unacceptable. Based on his reply we question whether the Overseas Security and Justice Assistance guidance is fit for purpose.

It has been the policy of successive UK Governments to work with overseas governments to help reform their criminal justice systems. Proposals for doing so are assessed using the OSJA Human Rights Guidance. This guidance manages the risks of serious human rights violations resulting from HMG security and justice assistance overseas.

The OSJA assessments framework is, we believe, among the world's best systems for identifying, mitigating, and monitoring the risk of unintended human rights violations. Whilst some other countries have screening tools for assessing programmatic human rights risk, OSJAs also require effective mitigation measures, have appropriate clearance channels, and consider reputational risk.

The OSJA guidance and checklists are designed as a practical tool that Government officials need to make difficult decisions, to ensure that security and justice work reflects the Government's commitments to strengthen and uphold the record of the United Kingdom as a defender and promoter of human rights and democracy. Further information is available on the Government website .gov.uk or via the following link: <https://www.gov.uk/government/publications/overseas-security-and-justice-assistance-osja-guidance>

The Government would note that the methodology utilised by a number of countries in their tendering and contracting including, in some instances, non-disclosure agreements, means the details of any commercial activity between a UK supplier and overseas governments remain commercially sensitive and confidential in their nature.

The Government considers proposals from the College of Policing to carry out international work on an individual basis. In doing so, the Government takes into account factors including the human rights record of the recipients of assistance from the College and consistency between the proposed support and other work the Government is carrying out in the country concerned. These considerations may vary from one country to another.

23. We understand that Chief Constable Andy Marsh, the National Police Chiefs' Council lead on International Policing, has been in discussion with the Government on a cross-government strategy for international policing, the aim of which is to provide further clarity on the ambition for British policing abroad. This is welcome and we recommend the Government accelerate the development of such a strategy which we want to see by the time we revisit this report.

We support the work of Chief Constable Andy Marsh, the National Police Chiefs' Council lead on International Policing, in establishing the Joint International Policing Hub to act as the single, recognised gateway for international policing assistance for domestic and global partners. The development of a cross Government strategy to provide further clarity on the ambition for British policing abroad will require careful consideration involving discussions with Whitehall partners and policing stakeholders on our respective aims and objective in overseas deployments. We acknowledge the Committee's recommendation and the Government will consider this issue.

Appendix 2: College of Policing's response

Letter to the Committee Chair from Chief Constable Alex Marshall, CEO, College of Policing

I would like to thank you and the Committee for your considered and constructive review of the College's work, published on 9 July 2016.

We are pleased that the Committee has recognised the start we have made since our establishment in 2013, as the professional body for all those who work in policing in England and Wales. We are working hard to provide those working in policing with the skills and knowledge necessary to prevent crime, protect the public and secure public trust.

We welcome the Committee's acknowledgement of the importance of ensuring consistently high standards across policing. We have a significant role in tackling this challenge. All of our work aims to raise professionalism and standards across policing, to ensure the public receive a high and consistent standard of service. However, as the Committee rightly recognises, ensuring consistency is a shared issue across all policing partners, at national, regional and local level. Each has a role in ensuring a high standard of policing is delivered for the public.

We have responded in detail to each of the Committee's recommendations below, and where necessary provided clarification on our role. Before considering our response, we thought it may be helpful to reiterate our three complementary functions, which set out the parameters of what we do and provide context for our reply. They are:

Knowledge – we develop the research and infrastructure for improving evidence of 'what works'. Over time, this will ensure that policing practice and standards are based on knowledge, rather than custom and convention.

Education – we support the development of individual members of the profession. We set educational requirements to assure the public of the quality and consistency of policing skills, and we facilitate the academic accreditation and recognition of our members' expertise.

Standards – we draw on the best available evidence of 'what works' to set standards in policing for forces and individuals. Examples include our Authorised Professional Practice (APP) and peer review.

1. Recognition

We welcome the Committee's affirmation that the College is a 'permanent and essential' part of the new landscape of policing, and that we have 'made an impressive start'. Our achievements to date include:

- The first code of ethics for UK policing

- A leadership review which identifies what might be required of police leaders in the future
- Setting the National Policing Curriculum, including entry requirements and the content of the Strategic Command Course for the most senior leaders
- Delivering direct entry schemes which are broadening the profile of new entrants to policing.
- The What Works Centre for Crime Reduction – helping policing professionals and the public to benefit from research
- Providing peer support services to forces, including a national series of child sexual exploitation peer reviews to 38 forces
- Developing the first methodology which enables forces to measure actual demand for their services, compare demand between forces and make evidence based decisions about meeting local needs.
- Facilitating the sharing of good practice online through POLKA; our secure online network for policing which has over 57,000 registered users.
- Registering over 30,000 delegates on UK events and training courses last year.

We accept that we have more work to do to engage front line officers and staff. We want to pursue a direct relationship with individual members, similar to that of other professional bodies. The College was established without the ability to directly contact everyone in each of the 43 independent forces in England and Wales. Since 2012 we have worked hard to build contact details and ensure members can be contacted via an IT platform which enables direct interaction. The College has developed and tested this platform to ensure it can function at the necessary level of security for policing and is accessible to members on handheld devices. We have now commenced the roll out of the membership platform and we will invite all officers and staff to sign up to the College in a phased approach. This gradual roll out will help to ensure the stability and security of our IT systems and make the benefits of College membership available to all front line staff through the most convenient means possible.

The Committee is right to note that our connection to those who work in policing is significantly affected by partnerships, with chief constables, police and crime commissioners, staff associations and others. We will continue to work hard to maintain and further strengthen these relationships.

The College welcomes the National Police Chiefs' Council response to this report¹, which reaffirms a commitment to working with the College.

2. / 3. Consistency and standards and the Code of Ethics

We welcome the Committee's support for the introduction of a code of ethics for policing in England and Wales and our decision to prioritise its development.

1 <http://news.npcc.police.uk/releases/chief-constables-committed-to-working-with-the-college-of-policing>

As a code of practice, the Code of Ethics places a legal requirement on chief constables, and those they are responsible for, to pay regard to its principles. There is an expectation that all those who working in policing use the Code to support everyday decision making and active adherence to the principles is an essential pre-requisite of joining the College. The Code has been placed at the heart of the National Decision Model (NDM), recognising the need for all police decisions to be consistent with the principles and standards of behaviour set out in the Code. This means that within the NDM, the Code is integral to police training and, over time, will become further embedded in police culture.

Her Majesty's Inspectorate of Constabulary (HMIC) has conducted an overall assessment of the legitimacy of forces, including a specific consideration of use of the Code of Ethics, as part of its annual PEEL inspections. In 2015, HMIC found use of the code to be variable across forces and stated that this variation in approach to a code which is issued under statute is unacceptable. The College is working closely with HMIC to ensure that its inspections are fully informed by the work of the College. HMIC assessments provide a means for auditing progress made in individual forces in embedding the Code of Ethics and we hope the 2016 legitimacy assessment will demonstrate that improvements have been made.

In addition, in 2015 the Committee on Standard in Public Life (CSPL) reported on leadership, accountability and ethics in policing. It found widespread recognition of the importance of the College's Code of Ethics and diverse good practice in embedding the Code within policing forces. The CSPL recommended that police and crime commissioners' responsibility for holding the Chief Constable to account should explicitly include promoting ethical behaviour and embedding the Code of Ethics, while each PCC Police and Crime Plan should set out how they intend to do this. The College has welcomed the CSPL's report.

The College recently gathered together the vast majority of forces, including the Ministry of Defence Police, the British Transport Police and representatives from the National Crime Agency and Independent Police Complaints Commission at a national conference to share notable practice in embedding the Code. This conference was the start of a process of working with partners and the profession to share evaluation of how the Code is used, to spread knowledge of what works and to help forces embed it. We are also encouraging forces to make the Code a central part of new officers' induction. We support all methods which are shown to work in helping to embed the Code of Ethics, including signing a copy of it. However, the exact form of the Code's adoption remains a matter for each force.

We agree that widespread recognition and understanding of the Hippocratic Oath in medical professions provides an example to which policing could aspire. In developing the Code we learned how other sectors encourage effective embedding of similar measures, including how the General Medical Council (GMC) drew on the Hippocratic Oath in developing its 'Good medical practice'.

The principles set out in the Code of Ethics underpin and strengthen the existing procedures and regulations for ensuring standards of professional behaviour, for both police officers and police staff. This gives the profession and the public the confidence that there is a system in place to respond appropriately if anyone believes that the expectations set by the Code of Ethics have not been met. Breaches of the Code will not always involve misconduct or require disciplinary proceedings. Breaches will range from relatively minor

shortcomings in conduct, performance or attendance through to gross misconduct and corruption. Different procedures exist to ensure any behaviour which does not uphold the policing principles or falls short of the expected standards of behaviour set out in the Code is dealt with at the most appropriate level according to its severity and in a timely and proportionate manner. It is possible that there are situations where doing the ethical thing (embedding the Code) may not be the same as obeying an employers' order (governed by Conduct regulations). For these reasons, we do not agree that the Code (guiding an individuals' professional judgement, ethical decision-making and helping them to express their personal professionalism and responsibilities) and Conduct Regulations (discipline and adherence to rules set by an employer) must be consolidated, although they clearly should interact.

4. / 5. Lack of consistency

Responses to recommendations 4 and 5 are primarily a matter for the Government, Police and Crime Commissioners and Chief Constables, but we are fully supportive of the Committee's comments.

The Committee refers to the scale of our challenge in this regard. This challenge is amplified by the fact that we set both standards for forces and for individuals within those forces (for comparison, the committee will be mindful that the General Medical Council sets standards for doctors, but not for hospitals). Maintaining an appropriate balance between the pressing needs of both of these important groups will be an ongoing challenge for the College.

We welcome the fact that chief constables have backed the College's approach to date, as affirmed in the response of the National Police Chiefs' Council (NPCC) to the Committee's² report.

All training should be completed to a nationally recognised standard which assures the public, other forces and other professionals that those working in policing have the knowledge and skills required to perform their role, wherever they are. We believe that both the public and professionals within the service would benefit from greater consistency; the public from enhanced assurance of the quality of service they receive, and professionals from assurance that they can have access to the necessary development in order to deliver policing of a high standard. Greater consistency would also reduce the need for retraining professionals who move between forces. The Committee's continued support for action in this area is therefore welcome.

The College convened a wide range of policing partners in 2016 to establish a consistency working group to address our shared concerns about this important issue. One example of work initiated by the College in this area is agreement of a nationally consistent definition of 'vulnerability' which would aid all forces' response to this major public priority.

We welcome the Committee's concern about adherence to statutory codes of practice; this is an area on which we continue to work with our partners to promote compliance. As we noted in our evidence to the Committee, the College would welcome an explicit requirement on HMIC to inspect against our standards in a broader range of areas, as one way of promoting consistency across forces in the public interest.

2 <http://news.npcc.police.uk/releases/chief-constables-committed-to-working-with-the-college-of-policing>

Supported by the Home Office, the College has taken positive steps to promote consistent delivery by examining how a 'licence to practise' approach might be introduced in the most 'high risk' areas of policing (e.g. addressing vulnerability).

6. / 7. / 8. / 9. Centralising recruitment and initial training

The College sets consistent standards and entry requirements for all forces across England and Wales, known as the SEARCH criteria.

As an initial step towards greater consistency in initial training, the College has conducted a wide-ranging assessment of existing provision in order to better understand variations in the delivery of such programmes, and we expect to publish this in the autumn. We will use this research to inform our proposals for a new framework of police education, qualifications, and also the standards we shall continue to set for initial recruitment and training.

We will also announce the results of our recent consultation on the future of a police education and qualifications framework this autumn. Although the College is not the employer, all entry into policing, whether at graduate or non-graduate level will continue to meet the same minimum standards set by the College.

A proposal for the College to centralise police recruitment is not currently part of the College's future plans. Such a change would require broadly-based support from a range of partners including PCCs and forces. This would be far beyond the College's current role and remit and we believe that other proposals could still bring about greater consistency in police recruitment, namely the College's current work to develop a Police Education Qualifications Framework programme (PEQF). The PEQF programme has the potential to effect a significant shift towards greater consistency in recruitment, and to ease transfers between forces. Through our work to explore a 'licence to practise' approach and set standards, the College is currently prioritising work promote consistency across areas of greatest public concern and professional need.

As CC Gormley of Police Scotland acknowledged before the Committee, the Scottish system is on a very different scale to England and Wales. The College is not primarily a training provider, but sets standards for training providers, for the reassurance of trainees and the public that they serve. For the College to effectively become the provider of police training through regional hubs would mean a significant shift away from its current focus, role and responsibilities.

Without pre-empting the outcome of the College's recent consultation on a new framework for police education and qualifications, due to be announced this autumn, part of our rationale for a proposed model of diverse entry points to the service through multiple providers and higher education partners, is to broaden, not narrow the experience of recruits. This includes options for recruits to attend a diverse range of multi-disciplinary institutions, where they will be exposed to different views and diverse people while learning from a consistent curriculum set by the College. While the intensity of a shared training experience may have benefits, we believe that we can best protect and deepen the service's diversity and openness to new ideas in this way.

We would welcome the continued support of the Committee as we work with the Home Office to ensure the outcomes of our review of the police education and qualifications framework are implemented across England and Wales.

10. Rationalisation of initial training

The College's role includes a clear responsibility to set the requirements for entry and the curriculum for initial training for police officers, but it does not include delivering initial training.

We are confident that the programme of phased roll out of our membership system to all forces will go some way towards addressing the level of recognition for the College amongst officers and staff.

We share the Committee's desire that initial recruits should benefit from consistent training and a shared ethos but believe that this can be best achieved by the College accrediting and effectively overseeing all training providers, rather than becoming one of a small number of organisations focussed on delivering training. Noting the Committee's encouragement for us to work with a wider range of accredited providers of training and services (Recommendation 18), we share the view that the number of providers is less important than the absolute necessity that they adhere to the same consistent standards set by the College. This will enhance the professionalisation of the service and better protect the public.

11. Qualifications, accreditation and professional development

We are committed to ensuring that our proposals for a new framework of police education and qualifications (PEQF) should play a role in enhancing the diversity of the police service, and will announce the outcome of our recent consultation on our proposals in the autumn.

We continue to examine the evidence about the impact of self-funding for degrees on the diversity of entrants to university courses. We are reassured that there is little evidence that such fees have resulted in a diminution of diversity. We were encouraged by the evidence of the Royal College of Nursing who informed the committee that since the introduction of a nursing degree, the profile of those entering their profession had in fact become more diverse.

12. Apprenticeships and diverse entry to the police service

The College takes its role in encouraging police forces to become more representative of the communities they serve very seriously and continues to support a range of programmes with this goal in mind. For example, the College continues to support forces in development and delivery of Force Action and Evaluation Plans to improve BME representation, and share case studies and good practice in relation to BME attraction, recruitment and progression. The College is also developing the next phase of the LGBT Role Model project and creating a network of senior LGBT colleagues, to help in developing a culture where difference is valued. We are also launching a Valuing Difference and Inclusion Strategy and Implementation Plan, to inform and influence the setting of relevant standards in forces.

We are committed to ensuring that our proposed changes to the Police Education Qualifications Framework (PEQF) play a role in enhancing, not diminishing the diversity of the police service, and will announce the outcome of our recent consultation on these measures this autumn.

The Committee's concerns about the potential for entry standards to have a negative impact on the diversity of new entrants may be ameliorated by our work with a range of partners to establish a Higher Level Apprenticeship (HLA) for policing. A policing HLA would involve recruits learning 'on the job' while in receipt of a salary.

As currently defined, our purpose does not include delivering the bulk of police training at a central or regional college. The potential impact of a requirement on recruits to attend a regional or national residential police training college on those with childcare duties, to name but one group, would need to be considered very carefully and our considered view is that the College can best influence police recruitment in the ways espoused by the Committee by setting standards rather than delivering training.

13. Degree level entry to the service

We welcome the acknowledgement that implementation of a new multiple routes into policing, including a degree option, could make a positive impact on policing. We believe that these benefits might include broadening the diversity of entrants to the profession, and significantly improving the long overdue recognition of the skills of current officers and staff, who often employ advanced skills on a daily basis without those skills being either acknowledged or accredited.

14. Professional development

We welcome support for the College's efforts to professionalise policing, with our decision to focus on supporting and recognising the skills of those already within the service. We endorse the Committee's call for senior officers to afford sufficient time for training to those whom they oversee. The College has sought to encourage the take up of training at all ranks by introducing a CPD programme for chief constables, which has so far involved around half of all chief constables. We hope that this expanded scheme will serve as a powerful example of the importance of making time for professional development to all members of the service.

15. / 16. Procurement

We note the Committee's call for improvements in the arrangements for police procurement.

The College currently facilitates the sharing of good practice amongst forces in this, and other areas, by providing an online forum with over 57,000 members. Through this forum those with questions about procurement, or those wishing to embark upon joint procurement, can engage with, and seek advice from other forces and national partners.

However, as the membership body for those working in policing, the College does not currently have the expertise, resources or appetite to expand our role into decisions about the procurement of police equipment.

We note that for ICT procurement, the Home Office initiated the Police ICT Company, which guides relevant decisions within the service on the basis of its considerable expertise in this field.

17. Register of Members

We welcome the Committee's call for the College to be given new powers which would help to ensure that the public receive a greater consistency of high standards of service from police officers and staff across the country. The changes recommended by the Committee would help the College to ensure minimum training and standards for certain specialist roles and underpin those standards through a system of national accreditation. They would also ensure that the College can provide consistent standards appropriate to a changing police workforce, where police staff take on a wider range of roles and work alongside those with police powers.

We understand that the Home Office keeps the College's powers under review and we welcome the Committee's support for this possible addition to our current responsibilities.

18. Working with higher education and specialist organisations

We agree with this recommendation. The College will continue to take an evidence-based approach and draw on the best from a range of possible training providers, to equip the police to serve the public.

19. Central co-ordination of relationships between forces and academia

Relationships with higher education providers are an important part of our mission to ensure the public benefit from policing which is based upon evidence of what works, and an expression of our guiding principles of knowledge, education and practice. Our general approach has been to facilitate and to seed partnerships, rather than to control them.

The College centrally influences the consistency of the education provided by setting standards for professional development through the curriculum. In the future, the Policing Education Qualification Framework programme will set standards for university education for policing ranks and roles, and should effect a shift towards greater consistency in recruitment and initial training. The College is a member of the Higher Education Forum which is a consortium of universities delivering policing related qualifications. We have worked in the forum to co-ordinate employers and education providers to develop proposals for a Higher Level Apprenticeship scheme for police constables, which, if approved, will be the single apprenticeship scheme for this role.

Police forces will still need to establish individual relationships with universities to facilitate local training and development. The College will look to develop an approved provider scheme for universities seeking to develop policing-related education and we will encourage forces to use this scheme when identifying university partners.

20. Governance and financing

The College is absolutely committed to securing the strengths that diversity brings to any board and in this, as all things, seeks to be an exemplar for the wider service. We acknowledge that having only one person from an ethnic minority on our board of 11 presents a challenge of resilience for the College, faced in common with other national policing bodies. However the representation of other visible protected characteristics is very healthy; for example 54% of our board members are female. To help address concerns about the limits of the Board's diversity in BME terms, our most recent recruitment to the Board involved the College targeting both media and recruitment agencies who offered specific access into BME audiences. Furthermore, our Nomination & Remuneration Committee will submit a new diversity plan to the Board this autumn.

Through our first open competition for an independent director, we were able to fill some of the 'expertise gaps' on the board which had been identified to the Committee; especially knowledge of professional bodies, by recruiting an individual who brought substantial experience both from a professional body and in building a successful business.

The next and most significant recruitment to the Board will be the Home Secretary's recommendation to the Prime Minister regarding the appointment of a new Chair and the College has communicated our awareness of the relative 'gaps' in our Board to the Home Secretary, with a view to these factors being considered by her during the appointment process.

Furthermore, the College is committed to commissioning the first external review of the Board once the new chair is in post. This independent review could provide recommendations to improve the Board's composition, skills and ways of working.

The Committee may also be reassured in this regard that the College benefits from an Independent College Advisory Panel (ICAP); a formal committee of the College which includes independent members from a diverse range of backgrounds and professions and advises the College Board on matters of equality and diversity.

21. Treasury rules and College financing

Treasury (HMT) rules mean that there is a gap of around £3m per year between what the College should charge for its services and what it receives. We welcome the Committee's call on HMT to allow us to close this gap and thereby offer a better service to the public.

22. / 23. International Assistance

We welcome the Committee's endorsement of the College's role in promoting the British model of policing by consent and human rights abroad. The College was pleased to provide full details of our own commitment to ethical dealings with partners at home and abroad and our procedures for ensuring that our work promotes human rights in our letter to the Committee on 10.05.16. We note the Committee's concerns about 'opaque agreements'. These have been the subject of limited disclosure in accordance with Her Majesty's Government (HMG) rules on the basis of considerations of commercial sensitivity or national security. We would like to emphasise the measures that the College

and our statutory partners all take to ensure that training abroad is both in the interests of the UK and includes clear teaching on human rights, which were detailed in our recent letter to the Committee (as above).

The Committee is correct to note that the College is required to act upon the advice of the HMG which will be best placed to respond to the substantive matter it raises.

The College has been as transparent about our contracts as HMG rules allow us to be. We continue to respond to FOI requests on these matters but have also taken the decision to proactively place a wide range of information about our work with foreign governments into the public domain via our website.

24. Transparency and written guarantees (foreign assistance)

These matters are governed by a cross-government process which includes input from Ministers. The College will continue to work within the framework it prescribes in addition to employing our own checks and balances to ensure that foreign contracts reflect and promote British interests and values. In order to be as transparent as possible about our work overseas we have placed a wide range of detailed information about our contracts on our website.

25. The Foreign Office and international assistance

This specific recommendation refers to the Foreign and Commonwealth Office.

26. IPAB, the Foreign Office and international assistance

This specific recommendation refers to Chief Constable Marsh and the Foreign and Commonwealth Office.

27. Tunisia

The College has worked with the Tunisian authorities in the past and stands ready to respond through the normal channels to any requests for further assistance.

I hope that this response is of assistance to the Committee; we should of course be pleased to provide further clarifications as required.

Finally, the College Board will carefully consider the Committee's report when it next meets in September.