

## **COSLA response to Draft Strategic Police Priorities**

This response is informed by previous lines agreed by COSLA elected members and by our four key principles:

- The empowerment of local democracy
- Integration rather than centralisation
- Outcomes rather than inputs
- The protection of local choice and accountability

Owing to the timing of this consultation, our elected members do not have the opportunity to formally clear this response ahead of the 16 August deadline for submissions. The response will be presented to our elected members on 9 September and any substantive comments or amendments will be reflected to Scottish Government officials immediately.

### **Questions**

#### **1. Do the revised Strategic Police Priorities sum up your ambitions for your police service?**

**Yes/No**

Our interests in policing are rooted in Local Government's statutory role in the governance and scrutiny landscape and, as a result, we are naturally interested in enhancing localism and the role of Police Scrutiny Committees. These Committees and the elected members on them provide vital local scrutiny but should also be seen by Police Scotland and the SPA as an important means of communication between the service and communities.

COSLA welcomed the pre-consultation on these priorities and are satisfied that some of our key messages were taken on board.

Overall, the draft Strategic Police Priorities (SPPs) are in keeping with COSLA's ambitions for the Police Service and are welcomed as an improvement on the previous SPPs. In particular, we welcome the clear focus on localism – emphasised in the Cabinet Secretary's foreword – and the recognition that consistency of service does not need to be at odds with the localism agenda.

While it is welcome that the Scottish Government are committed to strengthening accountability in policing, we believe this could come out more strongly in the SPPs. Whilst not directly impacted by the SPPs, governance should continue to be a key focus and it cannot be ignored that this consultation is taking place only months after the SPA Chair's Review of Governance was published. We hope to see the recommendations contained within that Review be implemented and believe strong leadership is needed to do this successfully.

For clarity, we have set out our response to the wording of each of the proposed SPPs below:

- *“Ensure that needs of communities are understood and reflected in the planning and delivery of policing.”*  
This is a welcome priority. In order to deliver on the principles set out in the Act, it is essential that the service understands and is directed by the needs of the community. Importantly, there is nobody better placed to convey the views of communities than

communities themselves and their elected representatives. For this engagement to be meaningful, Police Scotland and the SPA must clearly demonstrate how Local Scrutiny Committees and the Local Policing Plan feed into the national Annual Police Plan and the SPA Strategic Police Plan. The influence of the views of 'communities' should not simply be limited to Police Scotland's definition of 'Local Policing' but should permeate throughout the delivery of policing.

Similarly, in order to respond to the needs of communities, once they have been heard, Local Policing Divisions (and sub-divisions) need to be able to plan and deliver their services accordingly through subsidiarity within the service. The empowerment of Local Policing Commanders (including a degree financial empowerment) would facilitate this and the Chief Constable's commitment to explore this is welcome.

- *“Ensure the police service works to prevent crime and reduce fear of crime through partnership, communication, education, and innovation, placing particular focus on the need to address inequalities within and between communities.”*

We strongly welcome the focus on prevention and are encouraged already by Police Scotland's acknowledgement of the importance of a preventative approach.

Prevention can and should take place in a multi-agency context and it should be recognised that the work of local authorities and the police can have a preventative impact on the workload of the other agency.

The Reducing Reoffending agenda is a particularly strong example of this. Similarly, local authorities are key partners in contributing towards preventing radicalisation, counter terrorism and serious organised crime. Tackling violence against women should also continue to be the focus of preventative work Police Scotland perform. One estimate puts the cost implications of failing to address violence against women and girls at an estimated £1.6 billion for domestic abuse and £4 billion for violence against women in all its forms.

However, COSLA would like to see a firmer commitment in the Strategic Policing Priorities to tackling inequalities; tacking this on to the end of an overarching priority may not be enough. The consultation document rightly points out that the risk of being a victim of crime is higher for adults living in the most deprived communities. To add to this, the Scottish Crime and Justice Survey shows that the most deprived communities have also not benefitted from the fall in crime in recent years. Tackling inequality is integral to the Scottish Government's national outcomes and justice outcomes and should receive active attention from all agencies.

- *“Focus on keeping people safe by tackling crime and responding to and investigating incidents effectively and efficiently.”*

Response will clearly always be a core element of policing and rightly so. To work most efficiently and to ensure the service is responding to local need, all response work should take local circumstances and priorities into account. A topical concern is the argument that response services are at their most efficient when call handlers having local knowledge – an issue which has arisen over recent months in relation to C3.

- *“Ensure that the police service works collaboratively with partners at both local and national level to deliver better outcomes for people in Scotland.”*

Again, this priority is welcome. As mentioned above, if this commitment is to be meaningful, it requires resources to be directed by the service at a local level. Along with shared service delivery we would reiterate the need for shared measures of success outlined in the consultation document. We are aware that Police Scotland is currently refreshing its performance framework and, where possible, data on outcomes should read across agencies and able to be disaggregated to a local level.

Public space CCTV is a perfect example of an area that can only function effectively when partners collaborate and we hope that, in this area and others, Police Scotland and the SPA continue to work to a Community Planning agenda.

- *“Maintain public confidence in policing and inspire trust by being transparent, accountable and acting with integrity, fairness and respect.”*  
The content of this Priority is sound in principle, however it could be argued that “accountability and transparency” is distinct enough from “acting with integrity, fairness and respect” that each should have a separate priority attached to it.

Accountability must be achieved at a local and a national level for the public to have confidence in Police Scotland and a number of issues over the first few years of the single service’s life have highlighted flaws in the lines accountability. We welcome Ministers’ commitment to strengthening accountability and a body of work should be dedicated to this. Local Scrutiny Committees have a key role to play in providing the local element to this accountability.

Transparency and early engagement are also key. A mature and open approach to tackling the challenges faced by Police Scotland and the Local Scrutiny Committee should be seen as the mechanism for this. Fundamental to Police Scotland’s ability to be transparent is the data provided to Local Scrutiny Committees which should focus more outcomes rather than inputs or outputs.

On the other hand police ethics (“acting with integrity, fairness and respect”), equally important, is a separate matter from accountability and is more operational in nature. Local Scrutiny Committees also have an important role to play in monitoring police officers’ approach at a local level and their relations with the communities they serve. Something for future consideration may be to develop a clearer route for complaints about operational policing to be heard.

- *“Ensure the police service is able to take advantage of new opportunities and meet emerging threats and challenges.”*  
Finally, this priority makes sense and is relevant given the timescales involved and the fast-changing nature of the threats faced by our communities. One excellent example of Police Scotland’s adaptability has been their response to the emerging threat of New Psychoactive Substances. That said, we would expect all public agencies to be adaptable and to work together in meeting emerging threats and challenges.

## **2. Do the revised Strategic Police Priorities reflect the needs of your local community or the communities you serve?**

**Yes/No**

This is an important question to ask and something that should be kept under constant review. If the spirit of localism as reflected in the draft SPPs is to be realised, Police Scotland’s work will continuously reflect the needs of local communities and monitor how these are met. As outlined above, the police should continue to improve their engagement with communities and demonstrate how this has a meaningful impact on their work.

COSLA would propose that Local Scrutiny Committees are seen as a way of holding the service to account for ensuring these priorities are delivered at a local level and are delivered in a way that serves local communities.

### **3. Do you have anything to add to our impact assessments?**

**Yes/No**

We understand high-level nature of this draft document may mean that the impact assessments are difficult to undertake, however the drafts attached to the consultation document could better respond to gender. Police Scotland is signed up to Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls which is predicated on a gendered analysis of violence against women. As such, the impact assessment could better recognise the specific vulnerabilities faced by women and the need for these to be recognised in Police Scotland's approach.

This is based on the United Nations Declaration on the Elimination of Violence Against Women (1993), and it states: 'Gender based violence is a function of gender inequality, and an abuse of male power and privilege. It takes the form of actions that result in physical, sexual and psychological harm or suffering to women and children, or affront to their human dignity, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. It is men who predominantly carry out such violence, and women who are predominantly the victims of such violence. By referring to violence as "gender based" this definition highlights the need to understand violence within the context of women's and girl's subordinate status in society. Such violence cannot be understood, therefore, in isolation from the norms, social structure and gender roles within the community, which greatly influence women's vulnerability to violence.'

The Scottish Government may wish to speak to organisations with specialist knowledge of violence against women to discuss how the impact assessment could be improved.