

## **PSNI Response to “Our Plan: Doing What Matters Most - Draft Programme for Government 2024-2027”**

### **1. General Comments**

The Police Service of Northern Ireland (PSNI) welcomes the opportunity to respond to the **“Our Plan: Doing What Matters Most - Draft Programme for Government 2024-2027”** and looks forward to playing its full role in supporting its implementation.

The PSNI recognises the need for an overarching vision which sets the strategic direction for public policy and governance in Northern Ireland, and considers there are important synergies between this vision and the future ambition for policing in Northern Ireland as set-out in the draft Policing Plan (2025-2030). The PSNI is committed to improving outcomes for victims of crime, local communities and its workforce.

However, the PSNI is increasingly unable to keep people safe due to workforce levels being at an all-time low. 6,358 Police Officers and 2,344 Police Staff are well below the levels envisaged in the Patten Review (1999), as well as the New Decade New Approach (NDNA) Agreement (2019), and are insufficient to respond to and deal with crime.

The PSNI believes that, with declining headcount as well as increasing complexity of demand, the policing service is facing a watershed moment. This year alone the PSNI has closed eleven Station Enquiry Offices, sought additional Police Officer capacity from Police Scotland to support its response to serious public disorder, and further reduced the numbers of Neighbourhood Police Officers which are essential for maintaining effective local relationships and reducing crime.

In order to keep people safe, the PSNI requires:

- Immediate resources to address in year short falls and halt the decline in Police Officer and Staff numbers.
- A sustainable, multi-year funding settlement to allow the Police Service to plan.
- A properly resourced Workforce recovery plan to reverse the decline and build capacity.

## 2. Specific Comments

### Our Plan – Our Commitment

The PSNI notes the commitments made by the Executive to **Our Plan** as an ambitious agenda of change for Northern Ireland.

The PSNI believes that key to realising this ambition is providing an effective policing service that polices with the consent of everyone in Northern Ireland. This, the PSNI also believes, is the cornerstone of a modern, prosperous and peaceful Northern Ireland, which itself is predicated on meaningful, genuine cooperation across all of society.

### First Minister & Deputy First Minister’s Foreword

The PSNI notes the three phases of Our Plan, namely: **Doing What Matters Today**; **Building New Foundations**; and **Shaping a Better Tomorrow**. These broadly reflect the three phases of the PSNI’s own emerging strategic plan, and which are represented by Survival; Recovery and Growth.

The PSNI welcomes the importance placed upon “**making our communities safer, including a particular focus on women and girls**” as immediate priorities for 2024-25. The PSNI considers it is best placed to lead on the delivery of these priorities, and looks forward to these priorities being appropriately resourced and continued collaboration with a broad range of partner organisations.

The immediate priority to establish a **£235 Million Transformation Fund** is considered critical for making public services, including policing, in Northern Ireland better, more easily accessible, and more efficient. The PSNI looks forward to engaging fully in this process for the benefit of victims of crime and the wider population in Northern Ireland.

The PSNI also welcomes the three Missions of **People**; **Planet**; and **Prosperity**; as well as the cross-cutting commitment to **Peace**. The PSNI strongly believes it underpins all of these due to its own strategic activity but also the unique role it performs in upholding the rule of law.

Making a real and positive difference to the lives of the people who live here can only be achieved by securing an effective and sustainable funding settlement for policing.

Without that, the PSNI believes the strategic delivery of the draft Programme for Government is at considerable risk.

### **Doing What Matters Most Today**

The PSNI notes and welcomes the nine immediate priorities that will shape the work of the Executive throughout the course of this year (2024-25) and the duration of the current mandate.

The PSNI believes it can make a specific and significant contribution to the realisation of five of those nine priorities, namely:

- **Grow a Globally Competitive and Sustainable Economy**
- **Cut Health Waiting Times**
- **Ending Violence Against Women and Girls**
- **Safer Communities**
- **Reform and Transformation of Public Services**

The PSNI's specific contribution to these immediate priorities is set-out under each priority below.

### **Grow a Globally Competitive and Sustainable Economy**

The PSNI notes this immediate priority involves addressing the four key challenges of: productivity; good jobs; decarbonisation; and regional balance.

The PSNI welcomes the proposed introduction of schemes to address barriers into employment. Although not specified in the draft Programme for Government, the PSNI considers that legacy is having negative consequences for policing, not least as a barrier to recruitment from certain sections of the community. The PSNI believes that the legacy issues forced upon it have impacted significantly on resourcing and progress in improving confidence in communities, which have the most mistrust of policing.

The PSNI also welcomes the proposal to introduce new **Employment Rights Legislation** and a **Good Work Charter** to ensure better quality jobs and promote a healthy work-life balance. The PSNI is extremely concerned about the welfare and wellbeing issues for its workforce created by the demands of policing, and exacerbated by reducing numbers of Police Officers and Police Staff. The Service's

absence levels and ill health retirements are alarmingly high. The PSNI, in partnership with the Northern Ireland Policing Board (NIPB), has prioritised its workforce in the draft Policing Plan (2025-30).

The PSNI also considers that the current Regulations governing Police Officer pay and Terms and Conditions require modernisation for future recruitment and retention needs, as well to reflect the Service's ambition as an Employer of Choice. For example, the minimum annual leave entitlement for junior Police Officers is too restrictive.

The PSNI supports the prioritisation of **decarbonisation** in the draft Programme for Government. The PSNI has been working to equitably transition to a more sustainable organisation while ensuring we continue to deliver our policing service to the people of Northern Ireland. The PSNI's Sustainability Strategy (2021-2025) sets-out the Service's ambitions and commitments aligning with other core Strategies within the organisation. As part of this, the PSNI monitors and reduces its environmental impact as an organisation through its Environmental Management System and has begun work to decarbonise through its Carbon Reduction Plan, aiming to meet carbon reduction targets and report on progress as a Public Reporting Body, in accordance with the new Climate Change Act (Northern Ireland) requirements.

The PSNI welcomes the commitment of the Executive to invest a further **£75 Million** to support the public sector's transition to net zero and seeks further information concerning its potential use in the PSNI to support wider and timely asset modernisation.

### **Cut Health Waiting Times**

The PSNI notes and welcomes the Executive's commitment to **Cut Health Waiting Times**, in particular the importance placed on developing solutions across the entire Health and Social Care system in Northern Ireland.

The PSNI currently experiences significant demands arising from societal mental health issues. Internal analysis suggests that the Service is spending in excess of 1,000 hours per week attending calls relating to these issues. This often means

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Police Officers are diverted from other important activities for long periods of time. This is unsustainable given current demands and reducing workforce levels.

In response to this issue the PSNI has initiated Right Care Right Person in partnership with Health and Social Care partners. This is important not just for the release of Police Officers to focus on core policing activities but also in providing vulnerable citizens with the appropriate care. The PSNI believes this is consistent with the Executive commitment to improve performance, increase productivity, and improve the quality and consistency of care is well understood.

Regrettably, as the fiscal environment deteriorates in Northern Ireland, the PSNI is increasingly finding itself as a service of first and last resort.

### **Ending Violence Against Women & Girls**

The PSNI welcomes the commitments made in respect of **Ending Violence Against Women and Girls**, however the PSNI would seek further clarification and information on the how the commitments will be achieved, along with the dedicated funding and resources that will be required to deliver. The PSNI considers that VAWG should be a priority across all of Government.

The PSNI notes the commitment to introduce better access and support for victims and survivors in the criminal justice system and more ways to hold perpetrators to account, preventing further harm and building confidence in the justice system.

The PSNI would welcome a greater understanding on the programme and road map for the introduction of a perpetrator programme of work – there will be a requirement to redevelop and shape the mechanism of how to provide a suite of resources, some of which will require offenders taking their own personal responsibility for behavioural change. It is impossible in the funding envelope to extend the current building better relationships programme, whilst a recognised programme it is time consuming, extensive in scope, resource heavy and expensive for organisations for the number of people that require this.

The PSNI welcomes the opportunity to extend the working partnership with the DOJ on the advocacy scheme, for victims of domestic and sexual abuse, however the PSNI believes there are significant decisions that have to be made in respect of the number of victims that the new scheme would be able to support. Therefore, this will

always mean that there will be victims who are unable to secure advocacy support services.

Service delivery will also need to be prioritised based on threat, risk and harm for those who are in the greatest need. This is not the vision that was discussed in the CJINI inspection into Domestic Abuse that sought an advocacy service available for all. This coupled with the remaining recommendations that are outstanding from the Gillen Review in 2019 (as outlined above ABE cadre) the availability of the REC facilities (including pre-recorded examination) and the inadequacies across family and criminal courts will impact women and girls more significantly than others.

The PSNI considers there is little within the Programme for Government that highlights where the services will be joined up and funding secured to review and make consistent changes across organisations – an example of this would be the implementation and operationalisation of domestic homicide reviews. Despite twenty-four women<sup>1</sup> being violently killed in Northern Ireland since 2020, there is no regular or mainstream funding attached to the considerable work that is required to support organisations make the necessary changes.

The PSNI is currently working with PPS to develop a joint RASSO strategy (only in draft form currently) and would welcome commitment from the Programme for Government for funding to be able to support the 30 recommendations within this joint strategy which will focus on

- Speeding up justice for victims
- Streamline extraction process for digital forensic evidence
- More victim centred approach to third party materials including medical and counselling records
- Dedicated prosecutors for RASSO investigations and prosecutions
- Trauma informed approach for investigations and engagement with victims in a manner which they have sought and agreed with
- Prioritisation on understanding victim attrition and withdrawal
- Supporting and investing in our people (PPS and PSNI) – training, policy and technology

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<sup>1</sup> As of 21 October 2024

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The PSNI considers there is little highlighted to understand the level of funding to support the significant work that is indicated to achieve – the level of input and support required to provide advocacy to victims, hold perpetrators to account and right the indiscretions and wrongs of decades of micro-aggressions and ineffective systems for women and girls will required concerted efforts and funding to match. It is indicated that the EVAWG strategy comes with a £3 Million funding envelope. It is unclear whether or not there is likely to be successful transformational change bids. In order to put this into context when PSNI introduced the Domestic Abuse & Civil Proceedings Act (NI) 2021 this cost PSNI alone almost £1 Million based on the 5 strand work stream

- IT changes
- Policy
- Front line support
- Training
- Communications and awareness

This was based on the extraction costs for training, the investment with partners to build a bespoke training, and the IT development along with the calculation of the time for Officers / Staff members involved in the development process. It should be noted that to deliver against the legislative changes within this legislation (i.e. to have annual training) this will cost in the region of £200,000 which highlights the real cost of significant change. This was one of three pieces of new legislation in the last mandate in the VAWG agenda, and whilst they are welcomed, the tools available to the PSNI come at a financial cost. Consequently, the PSNI believes £3 Million is unlikely to provide enough funding for meaningful change.

The PSNI further notes the reference in respect of technology investment. The PSNI would welcome a clearer picture on the funding commitment – AI, private business and other law enforcement technology systems highlights effective mechanisms to review, extract and secure evidence. This will allow not only to secure evidence and keep up with the technology that criminals take advantage of but to direct resources for follow up in the most appropriate locations. For example, where there is technology that highlights that the perpetrator has been within X distance from their victim, or where they are not complying with their conditions about contact with their

victim (i.e. they have breached their orders and available for arrest). There is limited opportunity for the PSNI to hold pace with technology that is available in the commercial market

### **Safer Communities**

The PSNI notes and welcomes the inclusion of **Safer Communities** as one of the Executive's immediate priorities. Although overall recorded crime rates are decreasing in Northern Ireland these mask an increase in specific crime types which have considerable impact upon victims, and can also be considered complex in their nature. Complexity has shifted from a relatively low resource intensive demand generated in the public space (for example assaults, robberies and thefts) to more resource-intensive investigative demand taking place in the private sphere (for example cybercrime, serious sexual assaults and harassment).

The PSNI fundamentally believes that it must be sufficiently resourced to respond to this shifting demand and increasing complexity. Ultimately, the PSNI's ability to keep people safe and support Safer Communities is at considerable risk.

The PSNI also takes the view that Safer Communities includes Safer Roads. Despite a steady reduction in annual road deaths from the 1970s through to the early 2000s, the number of road deaths per year has plateaued over the last twenty years at around 55, or approximately an average of one fatality per week. Whilst road safety strategies have been developed and launched; and whilst various agencies are working collaboratively to educate the public and develop new engineering solutions; the amount of enforcement on our roads has reduced significantly due to budget cuts and competing policing priorities. The PSNI now has around 20% less Police Officers dedicated to road safety than ten years ago and, reluctantly, has again been forced to remove Police Officers from such roles in the last financial year.

The current Northern Ireland Road Safety Strategy seeks to reduce road deaths by 50% (i.e. down to an average of 35 fatalities per year) by the year 2030. The simple reality is that unless there is significant investment in all elements of road safety (education, engineering and enforcement by Police Officers and via road safety cameras) this target is unachievable. Failure to invest in the necessary enforcement will also mean that the devastation caused by road deaths will continue in our society.



The PSNI also notes and welcomes the emphasis placed on **Paramilitary Gangs** given the estimated cost to the Northern Ireland economy is £750 Million per annum. The PSNI further notes that Serious & Organised Crime is estimated to cost the UK at least £47 Billion annually<sup>2</sup>.

Paramilitaries continues to pose an enduring threat that undermines community safety through their coercive and destructive impact; research indicates that paramilitarism continues to affect up to 40% of adults and 45% of young people in Northern Ireland. It is assessed that approximately one third (1/3) of organised crime groups (OCGs) in Northern Ireland have links to paramilitaries with 30% of the PSNI's investigative Organised Crime Unit ring-fenced in tackling those paramilitary gangs that post the highest levels of threat harm and risk. This ring-fenced resource is only possible due to additional funding through the Fresh Start Agreement (FSA) programme, granted on annual cycles.

The Paramilitary Crime Task Force (PCTF) has confirmed funding until March 2025, albeit there has been a 23% shortfall in the funding awarded for 2024/25. The PSNI notes the agreement of the Executive to continue with the EPPOC programme for a further 2 years until March 2027, however to date there has been no confirmation of the necessary match funding from the UK Government, which is required to fund the overall programme. In the event that funding is secured there is potential that PCTF will receive either a reduction in the funding received or PCTF will be awarded standstill funding which will reflect a reduction in real teams.

The withdrawal or any reduction in Fresh Start Funding would have a profound impact on the overall effectiveness of the PSNI's efforts against paramilitary groups across Northern Ireland which has potential to allow these groups to maintain or even expand their criminal activities and continue to cause significant harm in our communities.

Consequently, without the additional Fresh Start Funding the investigation into these paramilitary groups will be integrated into regular organised crime and/or District Policing Operations, and without the dedicated funding the investigative focus on

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<sup>2</sup> No Place to Hide: Serious and Organised Crime Strategy 2023-2028, December 2023

paramilitarism will be diluted and the overall investigative capability reduced. This will significantly undermine the Executive's ambitions in this area.

The PSNI welcomes the inclusion of the **Speeding Up Justice Programme** in the Executive's immediate priorities. The PSNI believes there are significant benefits for victims of crime from securing a judicial system that enables cases to be processed and progressed more quickly. Equally, reducing the demand placed on the PSNI arising from current inefficiencies in the wider judicial system will, the Service believes, release much-needed capacity.

The PSNI notes the findings of the Report of a Rapid Independent Review of the PSNI's Demand and Capacity (Leapwise Report, February, 2024) which stated *"PSNI Officers and Staff regularly conduct legal and judicial functions which are not required in Forces in England and Wales due to differential arrangements across the criminal justice system"*. Differential arrangements include the role the PSNI performs in relation to: the operational legal advice provided to Police Officers due to the greater degree of separation and independence of the Public Prosecution Service (PPS) when compared with the Crown Prosecution Service (CPS); the execution of fine enforcement by PSNI Officers rather than by Court Enforcement Officers which is the practice in England and Wales; and the personal delivery of Summons by PSNI Officers.

As a victim-focused service, the PSNI is committed to modernising its own justice processes and has a track record of digital innovation and transformation to drive-out more effective and efficient processes with criminal justice partners, as well as improved interfaces with victims. Recent examples include: Community Resolution Notices, No File Prosecutions and cloud-based capability to transfer evidence to the Public Prosecution Service. The PSNI believes that further reform of the criminal justice system in Northern Ireland is essential.

The PSNI notes and welcomes the inclusion of **A Sufficient Number of Police Officers** as an immediate priority. The PSNI considers this to be the single most important issue the Executive needs to address this year.

The PSNI is increasingly unable to keep people safe due to workforce levels being at an all-time low. 6,358 Police Officers and 2,344 Police Staff are well below the levels

## OFFICIAL – PUBLIC

envisaged in the Patten Review (1999), as well as the New Decade New Approach (NDNA) Agreement (2019), and are insufficient to respond to and deal with crime.

The stark reality is that the PSNI is having to continually adjust its policing model based on available budgets rather than on policing needs and operational requirements that impact the general public in Northern Ireland

The implications for service delivery and performance from reducing workforce levels are stark. Service impacts include:

- **The PSNI's Neighbourhood Policing function is shrinking. This is impacting negatively on the prevention and deterrence of crime, as well as positive community relations.**
- **Non-emergency calls to the PSNI are taking longer to answer and at times the public are waiting longer for Police Officers to attend non-emergency incidents.**
- **The PSNI's capacity to investigate crime is being reduced and slowed.**
- **There is a reduced proactive presence on Northern Ireland's roads despite rising road deaths.**
- **The PSNI will continue to actively review access to, and consider the closure of enquiry offices across Northern Ireland.**
- **The PSNI's ability to respond to major events, civil contingencies, sustained protest and public disorder will continue to be reduced.**
- **As a service of last resort, the PSNI's desire and ability to support other public sector organisations is dramatically reducing.**

Recognising the perilous state of the its current capacity, the PSNI is finalising a business case that makes a compelling case for change to address the rapid decline in its workforce numbers, and looks forward to successfully resolving this issue with the Executive to secure a more sustainable resourcing settlement for policing in Northern Ireland.

## **Reform & Transformation of Public Services**

The PSNI notes and supports the immediate prioritisation of the urgent **Reform and Transformation of Public Services**. In doing so, the PSNI would wish to highlight the following issues:

- The PSNI notes the commentary in relation to “Police Officer numbers are at an all time low” and would refer to previous comments in this consultation response.
- The PSNI notes the outstanding recommendations from the Patten Report (1999) and would invite the consideration of these in relation to any future reform of public services. The PSNI would like to draw attention to recommendation 32 which recommended District Councils should have the power to contribute an amount initially up to the equivalent of a rate of 3p in the pound towards the improved policing of the District. The PSNI believes this has the potential to transform the sustainability of neighbourhood policing.
- The PSNI welcomes the establishment of a **£235 Million Transformation Fund** and would seek further information on its proposed use to support future reform and modernisation within policing, and the wider criminal justice system.
- The PSNI would, in particular, welcome further clarification in respect of the programmes of work that have been successful for the transformation fund. There are a number of areas of work that the PSNI has been working collaboratively on within the Violence Against Women and Girls strand (including domestic and sexual abuse, as well as the embedding and extension of the ABE cadre). This is not only something that has been included in the Gillen Review in 2019, but remains elusive from a PSNI and Health & Social care perspective because of the required funding. A pilot has been in place for approximately two years, however it is impossible to extend this further without significant financial input. The PSNI is not aware of this important pilot securing funding as part of the transformational funding applications.
- The PSNI would seek further information on the scope and remit of the planned **Public Sector Transformation Board**, including being consulted on its programme of work. The PSNI is committed to reform and has prioritised

## OFFICIAL – PUBLIC

the design of a new Service Operating Model as its strategic response to a rapidly changing operating environment. The PSNI believes that final design can only be achieved once the specific roles and responsibilities of partner organisations are clearly defined. This will require the input of important partners and oversight by any Transformation Board.

- The PSNI notes that one of the objectives of this Board is to increase the financial sustainability of public services. The predicted budget provision for the Service is stark. In addition to the £34 Million gap in the PSNI's structural funding, there is also some uncertainty with regards to the long-term security of additional funding streams, which are used to cover the salary costs of specific cohorts of Police Officers and Police Staff, and which in the event they are discontinued will compound the financial pressures on the Service. Funding for the PSNI depends on a direct grant, made on an annual basis, from the Department of Justice (DOJ). This makes planning over the current budget period and beyond more difficult. The PSNI wishes to advise this is very different from the rest of the United Kingdom
- The PSNI would also recommend this Board reflect on the lessons-learned of previous public sector reform in Northern Ireland, not least the Public Sector Shared Services Programme and the Review of Public Administration (RPA). The PSNI believes that opportunities were missed in relation to the co-terminosity of organisational boundaries, the connectedness of enabling legislation, as well as non-aligned performance management / accountability / governance frameworks. Addressing these will provide opportunities for greater strategic alignment across various sectors in the delivery of shared outcomes.
- The PSNI would also recommend consideration be given to the structural support that is required to support public sector reform and transformation. The PSNI notes the support that is provided to policing organisations in other jurisdictions as means to improve sector capacity and capability for change. Examples include: the College of Policing, and Home Office funding for the Police Productivity Review.

## OFFICIAL – PUBLIC

- The PSNI also notes the recent Review of the Northern Ireland Policing Board (NIPB), and would recommend a further review of all the current governance structures for policing as part of wider Public Service Transformation.
- The PSNI would seek further information on the planned legislative programme during the current mandate. The PSNI notes current gaps in the legislative framework for policing when compared with other jurisdictions, in particular the financial powers bestowed upon the organisation. Prioritising legislation which improves the capacity and capability of the organisation will have improved outcomes for victims of crime and local communities; thereby supporting **Safer Communities**.