REPORT ON POLICE SUBMISSIONS

 \mathbf{ON}

THE REVIEW OF POLICE ADMINISTRATION & MANAGEMENT STRUCTURES PRELIMINARY DRAFT REPORT 9 June 1998

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INTRODUCTION

This report summarises the views and ideas expressed to the Review Team in written submissions by members of, and groups within, the New Zealand Police. Despite the tight timeframe, the response rate has been impressive - in excess of 400 submissions were received. Submissions from external individuals and organisations are the subject of a separate report.

The Review Team records its thanks and appreciation to sworn and non sworn members. The standard of submissions was very high, reflecting the fact that many members had put a great deal of thought into the issues raised by the review.

This report focuses on the main themes covered by the submissions overall. It does not purport to exhaustively list all points of view on all aspects of the review, or to detail all ideas expressed or suggestions made. Nor does it purport to cover the high level of detail, argument, and supporting factual material contained in particular submissions. It is a summary.

The Commissioner of Police has separately read all submissions, as have staff at Police National Headquarters. Headquarters staff are vetting the submissions to ensure that all relevant considerations are factored into the review and the process that follows it.

The issues that attracted the most attention were outsourcing (especially search and rescue, fleet management, photography, and welfare) and reduction in the numbers of non sworn staff. These issues stood out not only for the number of submissions but also for the strength of the opinions expressed.

Set out below is a summary of the main themes that emerged from the submissions. At various points in the summary, extracts from particular submissions are quoted. These quotes are identified by submission number rather than by the individual or group that made the submission. This has been done because some individuals or groups making submissions may prefer not to be identified in what will effectively be a published document.

SUMMARY OF WRITTEN SUBMISSIONS

REVIEW PROCESS

General

Some 58 submissions contained comments on the review process itself. The majority were cynical about the review, expressing concerns that it was a cost-cutting exercise, that the process was flawed, and that their views would not be properly considered. A minority gave explicit support.

Many submissions, in commenting on the review process or various aspects of it (for example, particular outsourcing possibilities), conveyed a sense of frustration with continual reviews that either achieved nothing or reached a clear conclusion which was then liable to be challenged in an inevitable later review.

A particularly well-articulated example was submission 350:

"The review is not perceived as having high credibility within police. Media reactions and public comment suggest it may also lack external credibility ... As behavioural scientists (psychologists) we comment ... to articulate a pragmatic concern as to the practicability of implementing the findings (much of which we agree with ...). The review is perceived to lack credibility for the following reasons: ... The period allocated is not perceived as adequate. A universal interpretation is that the exercise is a perfunctory process for a series of fiscal savings that will be introduced no matter the findings or the submissions of staff. The truth of the matter may indeed be entirely different - however the perception is implacably otherwise ... The recent release of supplementary information ... was not seen as a genuine attempt ... to provide further detail, but rather a forced response to a potential judicial process ... Given the wide currency of these adverse perceptions there are concerns that the review presages inevitable changes and job losses. The common view is that it is better these be settled sooner than later ... The review does not allow any sense of empowerment for staff who perceive it as being imposed, pre-determined, politically motivated, and driven by fiscal imperatives."

Conversely, some submissions expressed strong support for the review process, and welcomed the opportunity to make a contribution and be involved in the process. Submission 74 stated:

"I have read with interest the preliminary draft Report ... a shake up of the police structure and their business operations has been long overdue ... I would like to thank the review committee for allowing the process of consultation and individual views to be fielded given the sweeping changes that will no doubt take place."

Timeframe

A number of submissions expressed specific concerns about time constraints. First, there were concerns that insufficient time had been allowed for the Review Team to fully understand the special nature and characteristics of police work. Submission 242 put it this way:

"Whilst I agree that every organisation should be reviewed from time to time to ensure the best use of people and resources, I believe an organisation such as the NZ Police deserves even greater attention to detail and fact, because of the nature of the service it provides. I do not consider that such a cursory look at the operation of the Department can provide enough information to any reviewer ... If the review recommendations are not going to deliver a better service to the public, then better to take a little bit more time to get it right."

Second, there were concerns about the timeframe for the submissions process, and consequent concerns about the adequacy of information provided by the reviewers. For example, submission 31 stated:

"The preliminary draft report ... did not arrive ... until 12 June 1998 ... Police staff ... expected that the entire document would be released in order that the consultation process could be entered into on the basis of fairness ... This, however, was not the case. The document requested staff to prepare submissions ... by 2 July 1998 ... Mr Martin (later) extended the deadline to 9 July 1998, but said that his report will still be ready for Government on ... 15 July 1998 ... Will Mr Martin be able to give all submissions his full and undivided attention ... in such a short timeframe?"

Level of Information Provided

A number of submissions stated that the review document and other material were insufficiently detailed to give a clear view of what was being proposed. Some suggested that the underlying assumptions were not articulated and that the rationale of various proposed changes was not spelt out. Some also stated that supplementary material and meetings cast little if any further light on the matter. Submission 63 was particularly to the point:

"Today was the day that the draft review ... was to be brought back to Districts ... Today was the day when rumour, conjecture and self doubts were to be cast aside, and some direction given as to where we were heading ... Myself and the majority of members present left the meeting no closer to the truth of the matter."

Level of Overall Resourcing for Police

A large number of submissions expressed concern that the review was focused on cost cutting. This concern came not only from those who were cynical about the overall review, but also from many who expressed support for the review, or aspects of it. Submission 314 was typical:

"I accept that there are positive aspects to the police review which will bring about change ... which results in a positive flow on effect ... What I am concerned about ... is ... this review clearly has an emphasis on cost-cutting/savings with preconceived cost-cutting figures in terms of staff numbers already decided before a closer evaluation of jobs at local level is fully carried out."

A few submissions made specific suggestions about police funding levels and/or mechanisms. Submission 166 suggested that additional taxation was required to fund police, and that significant savings could be made by bringing a halt to the progression of reviews and audits of police:

"Public (including members) would rather pay a few extra cents in tax and be properly resourced instead of spending millions ... on review after audit after audit and a review of the audit!"

Another submission (301) suggested a new funding mechanism for police based on local needs and priorities:

"In a review ... the primary question ... is 'how are the police funded?' ... The opportunity should then be made to fund at least some of the police budget on a local basis ... if a community wants more police or wants more traffic enforcement, then the community funds it. It also means that if the local rugby union requires a police presence ... they pay for it."

Scope of the Review

Some submissions suggested that the review had either missed the mark or had omitted issues that were crucial to improving the performance and efficiency of the police. Such issues included senior management and their perks (cars, Koru Club membership, cellphones, pagers, laptops, etc.), the need to reverse the corporate culture aimed at meeting budgets as opposed to providing a service, cost overruns on INCIS and CARD, and lack of resources for frontline staff. Submissions 286 and 21 commented on different aspects:

"The lack of sound management practices and the lack of accountability of some senior management is seen as a reason for this review. Until these areas are identified, and the required changes implemented at this level, there will be no long term savings or efficiencies."

"I would like firstly to state that the police service was in need of a review. I do however think that the terms of reference for this review were not wide enough ... In essence what this review has become is a way to save money ... and has not rectified the major problem ... that is lack of resources and manpower on the frontline."

Two submissions suggested that the review should have focused on, or at least included, a look at the strategic direction of the police:

"... locally based police officers working to strategies to reduce crime and unsafe behaviour should form the basis of any thinking on the role of the police" (360).

GOVERNANCE

General

Nine submissions commented on the governance issue. Most were concerned about the possibility of political interference with the activities of the police by way of Ministerial intervention at the Commissioner level. These submissions expressed strong views on the need for demonstrable integrity in police conduct and the need to maintain New Zealand's almost internationally unique tradition of a non corrupt police force.

Terms of Reference

One submission stated that the constitutional position of the Commissioner of Police (and constables generally) was outside the terms of reference, and that the review team were not mandated to consider this issue.

Commissioner

Some submissions voiced outright opposition to the Minister of Police being able to direct the Commissioner of Police at all, while others noted the need to ensure that any intervention stayed well clear of operational decision-making areas. Submitters cited the need to guard against political interference and corruption, arguing that the police owed loyalty to the law irrespective of the personal views of politicians or, indeed, of the police officers themselves. Submission 67 was particularly forthright:

"If the NZ police is to maintain its high standards we must be loyal to the people first and never to a political master ... Any thought of giving the Minister 'power over police' is quite frightening and I for one will leave the police immediately should this occur ... I hold no loyalty whatsoever to any Minister other than to police any laws democratically put through Parliament. That includes even policing law that I might consider ... as bad law. The law is the law until it changes."

Some submissions suggested other mechanisms to ensure accountability while providing for stronger safeguards against inappropriate political influence. These mechanisms included strengthening the procedures for the Commissioner to report to the Justice and Law Reform Select Committee (which was seen as an independent body) and requiring the Minister to channel any directions through the Governor-General. The Governor-General, as the representative of the Queen (to whom police swear allegiance) would be required to bar any directions that infringed police independence.

One submission (360) agreed with the Minister having the ability to give directions to the Commissioner provided that certain safeguards were put in place:

"We also agree with the increased transparency of directions issued to the Commissioner by the Minister. Any direction should clearly set out the reasons, and be tabled within a certain time period ... Consideration should also be given to allow the Commissioner to contest the direction at law."

Advisory Board

Two submissions questioned the need for an advisory board, stating that it was a poor substitute for ensuring that a competent person was appointed to the position of Commissioner and for making the Commissioner accountable for his/her performance. Submission 343 posed a question, then provided an answer:

"... advisory groups ... will not greatly add to the arrangement and may in fact be counterproductive ... what problem is the board attempting to overcome? If the issue is one of competence, that issue should be dealt with at the time of appointment and not through a construct which would be costly and only marginally useful."

However, submission 325 saw some practical reasons for an advisory board:

"I support ... a Ministerially appointed Board to scrutinise the police's business practices. This might help avoid issues like the INCIS fiasco for example."

ORGANISATIONAL (RE)STRUCTURE

General

The eight submissions that commented on the removal of the regional structure were generally supportive. Of the 52 submissions which expressed views on the districts, most were concerned with opposition to the place of Taranaki and Auckland/Northland in the proposed district structures. Others argued that the districts: were too few or too many, should follow local government boundaries, or were not sufficiently based on communities of interest.

Some submissions gave qualified support for flattening the organisational structure:

"The concept of flattening the structure and making Districts more accountable is welcomed with some reservations. The proposal for devolution of responsibilities and accountability to districts of some functions previously undertaken nationally raises concerns over co-ordination of those tasks" (252).

The proposal for a five-level structure was widely interpreted as a move to eliminate either senior sergeants or inspectors, and most of the 23 submissions on this issue strongly opposed such a development. A minority expressed an equally strong view that flattening the structure was a good idea.

Removal of Regional Structure

Submissions were strongly supportive of removing the regional structure. One example of this was submission 118:

"Region Headquarters only added to bureaucracy ... The removal of Regional Headquarters and devolution of those responsibilities to Districts is sensible and overdue."

Reconfiguration of Districts

Most submissions voiced concerns about the district structures, focusing on either Taranaki or Auckland/Northland. Submission 211 was typical of the concerns voiced about Taranaki being merged with other areas:

"In previous rationalisations Taranaki was left as a stand alone district because of ... geographical isolation and that in this area it was seen as a plus ... Savings (from rationalisation) ... would be minimal ... and amalgamation with districts outside our well defined community of interest could be hugely counterproductive to the goodwill and public support built up over many years."

Submission 194 neatly summarised concerns about the Auckland/Northland area:

"... the Auckland metropolitan environment is unique ... and should be treated as one area ... The proposed three districts of Northland/North Shore-Waitakere, Auckland City, and Counties Manukau crosses regional boundaries which bear no relevance to the population working or recreational environment or criminal activities ... Whangarei District has no common community of interest with either North Shore or Waitakere (and) ... while being small in terms of population it has a large geographic area ... RECOMMEND the division of the present Northland Region into police districts based on - (i) the Northland Regional Council (ii) the Auckland Regional Council."

In the other submissions, a variety of concerns were expressed and solutions suggested. These included:

"Northland, Northshore, Counties-Manukau, Waikato, Bay of Plenty, Gisborne/Hawkes Bay, and Tasman are not large enough to deal with major enquiries financially or in terms of resources ... Similarly, smaller districts would not have the proceeds of crime, CVIU, welfare, PEOs, iwi, dog coordinators, arms trainers etc that other (large) districts would. They would have to be supplied from another centre ... It is suggested that the number of districts be scaled down to 7 so they are all of viable size numerically and financially" (379).

"The proposed district structure takes little or no account of local conditions given the significant differences in population and area of each district ... The model proposed in the Review runs the risk of being too large and policing services losing their focus on their community ... A proposed formula for defining an 'area' could be: commonality with local territorial authority, ... population of a police area to be between 20,000 and 75,000 people, ... police staffing for each area to be between 35 and 100 sworn members, ... reported workload of each area, geographical and topography, ... other significant factors" (192).

Ranks: the Five-Level Approach

Most submissions were strongly opposed to any suggestion that the rank of senior sergeant and/or inspector be removed. A variety of reasons were stated, including that:

- these ranks were filled by experienced decision-makers who offered mentoring, motivation, and guidance to younger inexperienced staff
- loss of these positions would mean that complex and difficult cases would be managed by inexperienced staff, which would frustrate the long-term development of those staff
- these ranks provide a career path

• it is inappropriate to impose a template on all districts, and decisions on ranking levels should be made in the context of the particular needs of the district or parts of a district. For example, submission 253 suggested that Wellington's special needs (visiting heads of state, many demonstrations) meant that more supervisory staff were required.

Submissions 62 and 320 articulated concerns regarding the loss of the senior sergeant and inspector positions respectively:

"The Senior Sergeant is (or certainly should be) the mentor and motivator for front line Police operations, a controller in crisis and a facilitator on less hectic occasions. If the saying 'the buck stops here' applies anywhere in the Police, then 99 cents in the dollar stops with the Senior Sergeant (I accept that there is some scope to reduce the number of Senior NCO positions from the present)."

"The apparent removal of inspectors from the front line in the main centres, I believe exposes the organisation to unnecessary risk ... I think that rather than having a template which prescribes the structure of a district ... each district should be looked at in conjunction with the District Manager and senior staff and then a management structure could be determined to suit the particular needs."

It was also suggested that these are the ranks with an overview role and the time and experience to think strategically. Submission 346 suggested:

"Don't let the New Zealand police fall into the trap that overseas organisations did in the early 90s by flattening their organisations to a degree that few were left in team leadership positions who had the time, training or ability to think strategically."

A minority expressed strong views supporting the flattening of the structure, citing bureaucracy and ineffectiveness. One submitter stated that he, as a constable, had exercised a huge amount of responsibility in making decisions on how to deal with a situation, but that anything he committed to paper would get checked and rechecked through layers of management.

Such sentiments about excessive management layers in general are encapsulated in the following submission:

"Psychological Services substantially agree with the main thrust of the draft review document ... There is clear evidence that the manifold layers of management present a significant barrier to effective organisational responsiveness, and that excessive specialist groups exist that result in poor communications and lack of consultation ... unnecessary complexities extend both horizontally and vertically within the organisation and are further compounded by artificial divisions between sworn and non sworn groups. A result is that these distort service delivery and effective management" (350).

One submission also warned against the proliferation of sub-ranks, a tendency that is becoming apparent:

"I believe the Draft review document targets the right areas to achieve efficiency gains. The flattening of the organisation to 5 ranks needs to avoid the creation of "sub-ranks", such as when a single rank of Superintendent was created and the rank of Chief Superintendent disestablished. The reality is that we now have 5 'levels' of Superintendent with Superintendents reporting to Superintendents!" (199).

FUTURE RESTRUCTURING PROCESS

General

Generally, there was concern that any restructuring be carried through quickly to enable things to settle down as soon as possible. One submission noted the instability that arose from restructuring followed by further restructuring, and called on the review team to be accountable for results:

"There must ... be some long term empirical assessment of any implemented recommendations of the review ... This is because reviewers are always driven by a particular ideology ... and when the ideology changes the recommendations cannot help but do so also. Police are already suffering from the circularity this can cause (no regions, regions, back to no regions, what next?) ... It is simply ineffective and inefficient to be continually changing and recreating structures ... In the current environment ... it would be ... inconsistent if the review team was not held accountable for any changes it recommends that are adopted and then fail to produce the efficiencies touted" (132).

Timing and Process

One submission (325) suggested that the review team should be involved in implementing the review, because the police management were incapable of changing themselves. The need for restructuring issues to be resolved quickly was clearly stated by a number of submissions, for example:

"While there must be time for consultation, it would be a tragedy if the implementation of the review decisions ... moved at the same pedestrian pace as recent police restructuring. I would suggest that police staff are sick of the uncertainty of recent restructuring and will welcome a planned but speedy implementation process. The lingering uncertainty of having to reapply for positions, deal with reviews and face possible transfer or redundancy saps morale and hinders operational efficiency and effectiveness. The sooner the process is complete and staff can focus on our core business the better" (122).

Filling Positions/Access to Jobs

A number of submissions saw possible problems with a process to fill positions following restructuring. Three referred to the need for external participation in deciding appointments and/or the need for police positions (mainly upper management) to be open to non-police staff. Submission 71 stated:

"The selection process for entry into new positions needs to be reviewed. Use of traditional techniques will see the continuation of the 'old boys' network and culture. I suggest a panel including external representation be mandatory."

One submission placed particular emphasis on the need to ensure that the Commissioner was required to have management as well as policing skills, and suggested that shorter tenure and provisions for removal from office should be considered:

"The selection process for the Commissioner must be independent of the political process. The process must, however, be a sufficient test of fitness for the job to ensure confidence ... the Government can reduce its risk of poor performance by reducing the tenure of office, requiring incumbents to reapply ... Removal of the Commissioner ... should be for ... (the incumbent being) not a fit or proper person or gross mismanagement ... (and) ... should follow a fully transparent process and be subject to independent control (i.e. judicial) ... the Commissioner of Police should have competencies which cover general management experience as well as policing experience" (360).

One submission cited a worry that regional staff would effectively be excluded from district positions:

"The drafted People and Restructuring policy indicates that unless positions change significantly, incumbents will be reconfirmed in their positions. By definition, this means that all individuals in region administrations will be excluded from most district positions ... Police may deny themselves access to the best/most competent staff available for the new structure in 'ring fencing' district positions. It is suggested that local positions be open to all region staff" (379)

Staff Numbers and Deployment of Staff

Some submissions referred to particular considerations that should be looked at in determining staff deployment, for example, the stress imposed by particular types of work:

"... frontline policing has a limited term – a majority of officers can only perform frontline duties for a finite time before occupational fatigue and burn out is likely to develop. For this reason alternative duties are attractive and serve as useful respite that allows individuals to recover and return to optimum psychological fitness. Removal of alternative positions (especially through outsourcing) may offer apparent financial benefits that are illusory as increased attrition costs and lowered organisational commitment will cancel these out. Of those factors that contribute most to occupational disaffection in police, paperwork, lack of resources, administrative processing, and routine accounting functions consistently rate higher as cumulative stress factors than operational challenges such as dealing with conflict and traumatic events ... Therefore the review should consider the consequences of increasing these factor loadings on frontline staff" (350).

Another suggested a formula for determining deployment levels:

"The Review makes reference to allocation of resources on a community risk basis. This is fully supported by this District. Most of this District has a low socio-economic profile in which the root causes of criminal behaviour are inherent ... the Central North Island has historically the highest per capita crime rate in New Zealand ... Pure crime/population formulae penalise districts with crime decreases. Resources should be allocated on those factors which give rise to crime, e.g. unemployment, health, education, benefit levels, ethnicity. Crime decreases are then a measure of performance" (62).

A third suggested that the starting point for decisions on staff numbers should be staffing levels as at 30 June 1997:

"The 1997/98 non sworn personnel budget was ... based on staffing levels as at 30 June 1997. The Canterbury District ... had deliberately run under strength in our non sworn staffing so that we could remain within budget ... We saw the change to funding ... as being inequitable. It penalised districts such as ourselves and rewarded those districts that had not managed and had gone over strength and had overspent ... (this) is discriminatory against those districts that have managed their budgets well and benefits the non performers ... I therefore submit that the distribution of cuts to be made should be recalculated based on authorised entitlements rather than actual headcount" (45).

Surplus Positions and Redundancy

Over 90 submissions referred to redundancy, in most cases in the context of cutbacks in non sworn staff (see below). Some stated concerns about any compulsory redundancy, suggesting alternatives of voluntary severance or natural attrition. One submission noted the problem of retaining key staff during transition:

"Police will need to consider putting in place a mechanism to retain key staff during restructuring. A bonus at the end of some designated period together with standard redundancy provisions may avoid a situation where essential staff whose positions will be disestablished at some future point leave for alternative employment immediately" (336).

GENERIC GROUPS/THEMES

Women

Two submissions expressed concerns about the position of women. Both suggested that a greater balance between the sexes would be beneficial to the police, and foresaw problems arising out of the restructuring:

"... the proposed structure has the potential to significantly decrease the proportion of females employed in the NZ Police, both sworn and non-sworn. This will be detrimental to the Police organisation as a whole and its ability to provide quality service to the public due to an even smaller number of females providing unique input into an already male-dominated organisation ... The majority of non-sworn support staff are females and these are precisely the people who will be affected in the proposed restructuring with the elimination of support staff positions. The large number of non-sworn female support staff has assisted in addressing the significant imbalance in numbers per gender that exists in the NZ Police ... If the special circumstances of female officers as primary caregivers of children are not taken into account in this review there is the potential for premature resignations and the loss of experienced and valuable female staff" (274).

"The police acknowledge the need to increase and retain the number of women in the police as an expectation of our client communities and as good business practice. The women's consultative committee is a proactive initiative and works towards achieving a more representative workforce and a supportive work environment ... this submission recommends that each district appoints a representative on the National Women's Consultative Committee. This would mean an increase of up to 5 members ... and districts would meet costs as regions have in the past ... This submission recommends that the EEO office provide a central core function for the WCC" (367).

Iwi Liaison

One submission raised concerns about the need for progress to be made on the police's commitment to iwi liaison in any implementation of the review:

"If our plan is to create a network for ILOs throughout the country, all doing the same thing and working towards the same kaupapa, without having to continually battle district managers ... this could be better addressed through a service centre approach especially if that service centre coordination had a direct and close link to the cultural affairs office ... Despite what district management would say, the reality is that there has been limited national acceptance of the role ... of iwi liaison officers ... e.g. a district manager servicing a population of a quarter of a million people ... tries to get by with .4 of an ILO position yet still affirms his commitment to iwi responsiveness, and ... the National Cultural Affairs Officer can be directly told not to come to a hui organised to talk specifically on our responsiveness strategies" (397).

Youth and Youth Education

A few submissions emphasised the importance of youth aid (see Community Liaison below), and the need for youth education initiatives to be maintained as part of preventative crime strategies. Submission 180 was mainly concerned with the national and northern district situation, while submission 229 addressed the districts generally:

"The New Zealand Police Youth Education Service (YES) is widely regarded as the best of its kind in the western world ... (it) must meet the stringent requirements of the Ministry of Education ... It is the role of the National Manager to ... maintain these links. This partnership is also required by the Ministry of Health, LTSA and DARE ... It requires a person who is well aware of the system. It cannot be done by Police Officers with no in depth knowledge of YES or external stakeholders. It is critical to the effectiveness of YES that the positions of National Manager and Curriculum Development Officer are maintained. In this (Northern) region, the co-ordinator of YES is essential?"

"The Management meeting strongly affirms the need to have specialist YES coordinators (in each of the 11 districts) ... (which recommends that) ... where a district has ten or more police education officers, that district will require a full-time dedicated YES co-ordinator. Districts with less than ten YES officers will require a part time YES co-ordinator?"

Community Liaison

Two submitters made succinct points about community liaison:

"There appears to be little recognition in his (Beckett's) paper of the specific role the Community Relations Coordinator and Community Relations section play ... the current (Canterbury) Community Relations Coordinator and staff's role and the current established ranks and positions should be retained" (352).

"... the Police need to put more into staff resources for both Youth Aid and Community Policing. It is not sufficient to say that we need to focus on these areas – sufficient staff must be made available to actually carry out the work" (255).

SERVICE CENTRES

Some 14 submissions commented on the proposed service centre concept, and views were mixed. Some were positive:

"The concept of a service centre has merit ... it is imperative that sufficient loading be built into the staffing formula for service centres to ensure they are self relieving ... If it was decided that districts were to provide relief for service centre personnel, this would have an adverse impact upon front line policing ... it is also imperative that the service centres are adequately resourced with motor vehicles and funding to ensure they are able to travel about and within a district to deliver their services" (31).

Others considered it ill conceived, and suggested that districts could specialise in particular services and contract amongst themselves:

"Service centres ... are a needless and wasteful addition to the new structure ... There is no need for a separate entity to contract services to PNHQ. If a demonstrated need to contract a service to surrounding districts exists (i.e. AFIS processing, SAR, Surveillance), the district in need may simply contract with the supplying district ... The indications are that service centres are merely a cautious approach to devolving all previous Region responsibilities to district managers. Having created the expectation of devolution and empowerment at lower levels of management, that caution is not justified" (108).

One submission referred to the need for service centres to tender for work, while another saw a need to ensure that service centres offer services to avoid becoming de facto regional controlling centres. Some commented that service centres did not need to be in the main centres and may be better placed in cheaper locations, which would be more secure from earthquakes or other disruptions.

A number of submissions commented on appropriate activities for service centres. These included personnel processing, accounts payable and receivable, dog centre, VIPP, Eagle helicopter, Deodar II, undercover, Asian crime, APEC, CHOGM, America's Cup, training, national infringement bureau, prosecution services, commercial vehicle investigation units, occupational health and safety, EEO, and industrial relations.

NON SWORN STAFF

General

The major portion of the more than 90 submissions on redundancy focused on the proposal to make a number of non sworn staff positions surplus. Very strong opposition to a reduction in non sworn staff numbers was expressed across the board. The main reason given was that non sworn staff had been introduced and increased to free up sworn staff for frontline duties, and that reducing non sworn numbers would result in sworn staff coming off the frontline. Submission 225 reflected a typical view:

"If restructuring gurus are prepared to listen – experience will show that without support structures, ie., non sworn clerks, telephonists, receptionists, typists – then only lip service will be paid to the concept of quality customer service. Should these positions be removed, then logically sworn Police Officers will be used as clerks and typists. An argument exists that these functions could conceivably be carried out by more non sworn persons than is currently the case – not less. To use Police Officers in these positions would not be cost effective."

The submissions overall revealed a strong sense of pride on the part of non sworn staff in the job they were doing. Despite a few expressing concerns that non sworn staff were seen as the poor relation, there was an expression of admiration for them from sworn staff, and a hint of desperation at the prospect of losing their services. In this regard, the police psychologists stated:

"Of those factors which contribute most to occupational disaffection in police, paperwork, lack of resources, administrative processing, and routine accounting functions consistently rate higher as cumulative stress factors than operational challenges such as dealing with conflict and traumatic events ... therefore the review should consider the consequences of increasing these factor loadings on frontline staff" (350).

Other submissions suggested that non sworn staff were being disproportionately affected by the proposed restructuring because they were seen as politically expendable: reducing their numbers would be less publicly controversial than directly reducing sworn staff numbers (though the practical effect on sworn numbers would be the same).

Typists

Submissions that specifically referred to typing positions reflected the same points covered under "General" above. A strong theme was that removal of typist positions would be inefficient. Submission 226 put it this way:

"Police Officers with no specialist training as word processor operators would take two to three time as long to produce the quantity of output and even then the quality would be unacceptable. This would result in front line officers, by necessity, spending valuable policing time desk bound."

Opposition to outsourcing typing services was also evident. Confidentiality factors were often cited, along with suggestions that delays involved in outsourcing (in delivering the typing, and while drafts are shunted on and off site to have corrections done, etc.) would increase frustration levels and inhibit efficiency. Some also made the point that typists were less expensive to employ than sworn staff. Submission 247 captured most of the arguments:

"Such services are invaluable in both operational and day to day situations to allow trained sworn staff to undertake police oriented duties and not to be bogged down with necessary but supplementary administration. This seems to fit with the civilianisation process the Department had undertaken which had many facets to support the process in freeing up sworn staff to undertake duties for which they are trained ... To remove non-sworn support staff is to put sworn officers (who are usually paid more than non-sworn Police) in their place to undertake their duties."

Clerical/Support

Various submissions also acknowledged the value of other clerical and support functions, such as those carried out by clerks, data entry staff, telephone operators and receptionists, and watchhouse officers. These submissions reflected the same themes as those noted for "General" and "Typists" above.

SPECIFIC OCCUPATIONAL GROUPS/LOCATIONS

Commissioner's Office

A total of 27 submissions commented on those parts of the review concerning the Commissioner's Office. Some expressed support for the concept of a streamlined (and smaller) Commissioner's Office. Particular groups made suggestions about specific aspects of the proposed structure. These included submission 297:

"The Partnership Group supports the general direction of the review, but would suggest that there are inherent risks involved in absorbing the functions of the Partnership Project into a smaller Policy and Liaison section ... The term 'liaison' grossly undervalues partnerships which have the potential to be a significant change lever for the organisation both internally and externally ... Whilst it is accepted that partnerships development should never be consigned to a single business unit, there are real concerns that partnerships will be relegated to being 'an add-on to real policing or a portfolio position only ... Recommendations:

- 1. that partnerships be recognised as a major change lever ...
- 2. that ... 'Policy and Liaison' ... be renamed 'Policy and Strategic Partnerships'
- 3. that police very carefully consider using the word 'partnerships' only if there is genuine commitment."

Submission 256 expressed concern that the new structure may create functional barriers:

"We are concerned that the Project Support Office may be sited beneath the line control of a Deputy Commissioner. This could have the effect of minimising the PSO's ability to cross functional barriers between the Deputy Commissioners and District Managers. This risk can only be mitigated if there is a clear mandate from the organisation that the PSO can function in a matrix fashion ...

Recommendation 1: that the Project Support Office is sited centrally within the organisation and not within the office of a Service Centre or District

Recommendation 2: that the Project Support Office is mandated to cross functional boundaries within the Police including the line functions of the Deputy Commissioners".

One submission (344) expressed strong concerns about the suggested transfer of Internal Affairs responsibilities to the districts, and the detrimental impact this would have on perceptions of police disciplinary processes and the role of the Police Complaints Authority:

"The purpose of a complaint review at Police National HQ is not to duplicate what has already been done at district level but to provide a consistent independent review

of the investigation process The draft review suggests the disestablishment of the Internal Affairs Unit with the devolving of the complaints review and quality assurance functions to the 11 recommended districts ... Essentially, the experience and perspectives (of Internal Affairs) ... coupled with the independence ... would suggest that the complaint review function should remain with Internal Affairs staff at Police National HQ?"

Traffic Safety

A few submissions expressed concerns about the need to ensure that traffic safety and traffic enforcement receive appropriate priority. Most suggested some form of structural guarantee, such as a senior position and/or other groups or positions dedicated to traffic safety. Submission 215 suggested an officer in charge (of traffic safety) at district level:

"... each District Manager requires an officer with the title O/C: Traffic Safety to plan, manage and monitor traffic service delivery within the district".

Another suggested the need for a strong traffic-oriented presence in district management:

"There needs to be a person with traffic experience who is part of the management team and who reports to the District Manager" (320).

Submission 360 recommended district traffic safety centres:

"... it is recommended that Traffic Safety Service Centres be located within each district office ... local knowledge of roads, black spots and deployment is important to ensure the road toll is kept on a downward trend".

Legal Services

A few submissions were received which specifically dealt with legal services. Two strongly argued the need to maintain a viable (and not reduced) legal section at national headquarters. Submission 305 stated:

" ... specialist legal services (are available) at an average cost of \$70 per hour compared to a minimum cost of \$163 per hour (Crown Law ...) ... In-house legal services provide a more comprehensive role to management than would be the case if legal services were outsourced. The comprehensive services would include instant access to legal services combined with a lengthy corporate memory. Other matters would include policy development for law reform sought by Police, publishing training materials, in-service training, budget management, advice on matters reasonably unique to Police such as industrial relations, police contracts, and a value added quality to Commissioner's correspondence ... I do not consider that the New Zealand Police could afford to dismantle the very effective and highly regarded inhouse legal services provided to Police frontline staff ... Of the 10 current positions in legal section I see scope for devolving one FTE position in Privacy (advisory officer)

to Validation and Vetting and being able to save 11 hours per week from the Clerk's position but I do not see any scope to remove three further positions without clear directives on what current work is to cease."

Opinion was divided on the value of legal services at district level. Submission 127 suggested:

"The (Southern Region) Police Legal Section provides a service to both managers and front line operational staff. The significant majority of this service relates to operational policing. As such the Legal Section cannot be placed within the management structure of the organisation ... the provision of legal services based on negotiated agreements with District Managers is the most effective means of enabling the Police to provide its services to the Government and public of New Zealand."

Submission 245 expressed the opposite view:

"I see no need to have a number of legal advisers in each region when a centralised office, consisting of perhaps 2 or 3 advisers at most, can perform the same task. Whenever I have needed legal advice I have sought it from the local crown solicitor, as they are far more experienced in current court work."

Other Specialist Services

A number of submissions were received on a variety of other specialist services. Particular submissions:

- recommended that fingerprint units should be administered and controlled centrally (to ensure common standards, policies and equipment)
- urged that forensics not be merged with national intelligence (citing the need for a separate identity, and focused leadership and direction)
- advocated the need to retain prosecutors in the districts (citing local knowledge and relationships, costs of travel for travelling prosecutors or solicitors).

OUTSOURCING

General

The majority of submissions received dealt with one or more aspects of outsourcing. Many dealt solely with outsourcing, or even one particular outsourcing possibility.

With some exceptions, there was strong opposition to outsourcing of most of the proposed functions. There were, however, mixed views on the concept of outsourcing generally. Submission 37 expressed opposition:

"I believe that the consequences of outsourcing are: police lose skills, services ... could become user pays, police officers will leave the police ... to take up contracted work, ... (and) the contracts will cost the police more than if their own officers were doing the job."

An alternative view was articulated in submission 341 which gave qualified support:

"Outsourcing has been proved a success both in the private and public sectors, therefore there is no reason why the police should be different ... However, I do know that some of the activities defined in the report for outsourcing can still be done cheaper by police trained staff. For example, fleet management."

One submission suggested that each case should be looked at on its merits, which could be determined by making responsibility for different categories of work contestable:

"A better option may be to list ... (the outsourcing possibilities) as contestable rather than outsourced. Contestable allows for a proper cost analysis and comparison with police costs. Retention of the service may be the most cost effective option" (62).

Some submissions were critical of the analysis of potential cost savings in the review document. Submission 336 stated:

"The review suggests ... outsourcing ... would result in savings of \$26.5 million per annum. If efficiency gains of 20% were attainable, the total value of services outsourced would need to be \$130 million per annum; this seems unlikely."

A not uncommon theme in various submissions on particular outsourcing possibilities was the view that various categories of in-house work had remained in-house (or, in some cases, been brought back in-house) in line with the recommendations or conclusions of earlier reviews, audits, or other assessment processes. Many submissions conveyed a "why are we looking at this yet again?" feeling.

Prisoner Escort/Custody

More than 14 submissions commented on outsourcing prisoner escorts and/or custody. Overall, there was a significant level of support for outsourcing prison escorts. Submission 84 was typical of those received in favour of outsourcing prisoner escorts:

"I am not opposed to outsourcing per se and ... (for) ... prisoner escorts it probably can't happen soon enough for most staff and managers."

However, support was by no means universal. There were concerns that non-police escorts would not have the powers to deal with difficult situations:

"Police personnel such as court orderly and court escort have to deal with disturbances in all areas of the courts ... Police staff are trained to deal with these incidents and have powers" (155).

On prisoner custody, there was a greater mix of opinions. Some argued that 'Justice' (Department of Corrections) should take over the role:

"If you are serious in this regard why not look at the whole idea of custody and make it a function of the Justice Dept. Most cities have jails close by" (67)

Some submissions from provincial areas noted that outsourcing prisoner custody may save costs in the main centres, but would not do so in smaller centres. This was because prisoner custody was merely one of many roles that a multi-tasked watchhouse officer perform:

"Outsourcing prisoner escort will free up resources for police work ... Outsourcing prisoner custody may save money in the main centres however in provincial areas it would cost additional money ... Watchhouse keepers in provincial areas will still be required even if prisoner custody is outsourced, outsourcing this function will be an additional cost" (50).

Submission 262 made the same point, but also cited a range of problems that might arise if prisoner custody were outsourced:

"... their (watchhouse staff) functions also require there to be members present in a 24 hr capacity. At present they also look after prisoners. If this function were removed they would still be required to be at the station for the other functions ... prisoner custody relates to more than mere checking on the prisoners in the cells. Police powers are required to search, fingerprint, and photograph prisoners – the members need to be sworn to do this legally ... If the central holding facility were not at the police station extra staff would be needed for transportation ... If then police ... took their prisoners to some other organisation for custody the following problems would occur: no review of arrest by a supervisor ... custody not subject to PCA oversight ... bail decisions not made by police ... illegal arrests not picked up complaints made by prisoners made days later ... need for police doctors to travel ... lack of coordination in cases of escape and victims being advised of escape or release on bail ... possible double handling by police staff in bringing person to station for interview

... loss of evidence as to actions of prisoners and after arrest admissions ... loss of court cases due to Bill of Rights not being observed."

Scene Guard

More than 10 submissions commented on outsourcing scene guards. Most were opposed, mainly because of concerns to protect the integrity of evidence and prevent scene contamination:

"This is ... a specialist function which should be retained by police ... police have the expertise in scene preservation ... and also have the power to prevent unauthorised persons from entering a scene" (16(b)).

Other submissions noted worries about the honesty of those employed by security firms:

"How are the police going to protect the integrity of any scene guarded by these firms when a number of those employed by security firms have dishonesty convictions?" (21).

The point was also made that police are useful avenues for information gathering:

"... when police scene guards have been used, more often than not they are approached by members of the public and supplied information ... I see this as being an area that would dry up with the employment of private security firms" (271).

One submission (269) saw some scope for outsourcing scene guards but urged a cautious case-by-case approach:

"Use of private security companies ... needs to be assessed on a case by case basis. Some scenes are more important than others ... The decision as to use of police or private guards should be left to the operation O/C."

Infringement Processing

A few submissions commented on outsourcing infringement processing. Only one submission supported outsourcing, and then only provided it was shown to be more cost effective. Those opposed cited the undesirability of non-police making judgements on enforcement matters, while others cited security concerns. Submission 49 summed matters up as follows:

"I am at a loss to know how you can get higher skills and quality (from outsourcing) ... Are the outsourcers going to have a security clearance ... Can it be guaranteed that ... (in the case of absence) ... temporary staff ... will have security clearance ... I wonder about the credibility of the police if Joe Bloggs has access to the Wanganui computer and the ability to deal with and cancel infringement notices."

Speed Camera Operation

A few submissions commented on outsourcing speed camera operations. The majority of those opposed outsourcing on the basis that traffic safety was a key police role and the police need to coordinate speed camera operations as part of a wider strategy. Submission 31 noted:

"... speed camera operations removed from police control would be a detrimental step in that a key strategy of traffic enforcement would no longer be coordinated from a central point ... The situation could arise whereby a mobile speed camera (under an outsourced operator) is deployed on a road unbeknown to local police who have a stationary radar ... just down the road ... At present an integrated approach is taken."

Some submissions noted that speed camera operations did not need to be conducted by sworn staff, while another (228) noted the value of a police presence at speed camera sites:

"How is it possible for the outsourcing company to provide a better managed service, considering that at present the police have the only specialised vehicles, the cameras and trained staff ... The public see traffic cameras as police and often stop to report bad driving, accidents etc. Remove this and the police are even harder to find."

One submission, however, supported outsourcing speed camera operations, though cautioning against an overly commercial approach being taken:

"I see no compelling reason for police to be involved in the operation of speed cameras ... private companies who operate speed cameras ... in the US are funded on the basis of the number of successful prosecutions ... I certainly hope we do not come to that" (46).

Document Serving

Only a few submissions commented on document serving. Most opposed outsourcing this role on the grounds that important contact and information-gathering opportunities would be lost to police:

"... it is important that police retain the ability to serve some documents ... for example summonses to witnesses ... serving (these) documents gives the police the opportunity to liaise with and prepare witnesses" (116).

"Service of documents ... does give us intelligence of who's where and what they have done, have they moved, who are they living/associating with ... It gives us exposure to criminals. Witness summons ... are people we want to speak with, we don't want a summons just dropped on them out of the blue. We have to speak with them anyway and this is a good time. Good customer relations" (207).

One submission (173) stated that this role should be outsourced.

Commercial Vehicle Investigation Unit (CVIU)

A total of over 20 submissions commented on outsourcing, and almost all were opposed. Some referred to the Transport Select Committee Report on truck crashes in 1996 and urged that any changes be consistent with the recommendations in that report.

Reasons given for opposing outsourcing centred on the fact that CVIU staff often have to use coercive powers:

"How will civilians stop vehicles? Change statute? What vehicles will they drive? Surely we don't want to reduce the number of marked police vehicles on the road. If they drive a police marked vehicle, shouldn't they be cops" (36);

or that accident prevention work is crucial and should remain with police:

"Stats tell us that one in five fatals involves a truck ... (and) ... you want to give away this extremely important piece of accident prevention work ... this is a crazy idea" (67);

or that CVIU work gives police a good public face and outsourcing may lead to corruption given the sensitive commercial information that CVIU staff inevitably assimilate:

"... the general public ... see the police working proactively. They see commercial vehicles being regularly stopped and checked. Road safety is a big benefactor ... If outsourced ... the door is open to corruption and a lack of accountability" (142).

One submission (46), however, supported outsourcing this role:

"I agree that the CVIU is a function that will better be served by an outside agency, possibly passing to Land Transport or a similar agency."

Search and Rescue (SAR)

Over 49 submissions commented on outsourcing search and rescue. This area attracted particularly strongly held views, which were clearly and forcefully articulated. Submitters felt that police were central to the SAR process and that the volunteer network depended on police coordination – volunteers were less likely to participate if police were not in a coordinating role.

A variety of other reasons were cited in one or more submissions, including that the police are a 24-hour nationwide agency and provide important coordination and direction function that no other agency could meet:

"I have been present and seen the petty fighting between operators of helicopter services ... due to the publicity factor ... when TV news crews arrive. I have witnessed situations in the marine sector where individual(s) ... have been moving away from the common good and have had to be directed by the police as to the role that they are required to perform" (224);

that SAR work gives police a positive public profile, interaction with other groups, and access to information:

"... in a rural community, the public prefer not to visit or phone the police station. However, in a face to face situation (during SAR activities) they will volunteer a surprising amount of information" (submission 174)

and that SAR often involves body recovery and/or possible crime scene work:

"Search and rescue must be maintained by police ... Police currently have the infrastructure to fully maintain search and rescue operations ... Body recovery is another important aspect of SAR where police must correctly investigate the scene and satisfy the coroner ... It does not make economic sense to only involve police when a body is found" (41).

Some submissions cited other direct benefits for the police. These included suggestions that SAR was a good training activity, which gave police the capacity to pursue criminals in inhospitable terrain; that police involvement in SAR activities is a positive recruitment tool; and that SAR activities provide many members with welcome relief from frontline duties, thereby preventing burnout.

Submission 90 captured most of the arguments succinctly:

"The police are the only 24 hour agency suitably equipped ... (for) ... SAR work ... (and) have the systems ... that complement the resource input of local communities ... Many ... enter SAR groups because the police are there to supply the leadership ... SAR provides the police with a catalyst to liaise and work with their communities in non-threatening ways that build the goodwill and public support that enable us to carry out the confrontational duties with the same public backing ... Should SAR be outsourced, I doubt very much that the same degree of support will be forthcoming without those involved wanting payment ... SAR is an activity that provides recruiting appeal ... The cost of SAR is low because of the volunteer groups involved. Were SAR outsourced to a paid organisation the costs would escalate dramatically."

Despite the very strong overall opposition to outsourcing SAR, one submission suggested that the coastguard could take over marine SAR but that the police should retain their role in land-based SAR.

Photography

Over 56 submissions commented on outsourcing photography. Numerous well-articulated arguments were advanced in opposition to outsourcing.

A major reason given was that police photographers, unlike private firms, were highly trained and skilled in forensic photography, were available 24 hours a day, had highly skilled back-up (relief photographers) to cover for them, and could guarantee confidentiality. Submission 36 put it this way:

"Timaru has one photographer. If a private firm was to do the work would they always be available on short notice, ... have relief staff of equal standard, ... have a high standard of confidentiality?"

Concerns were also expressed that police would be unable to retrieve in-house capacity if outsourcing proved to be unworkable (as most submissions assumed would be the case). Others argued that outsourcing would actually be more expensive, noting the high capital costs of equipment.

Submissions also noted that some of the work, such as photographs for sexual abuse cases, required a degree of assurance and sensitivity from the photographer and a large measure of confidence on the part of those being photographed. The presence of a Police photographer achieved these requirements in the way that a commercial photographer could not. Also, much of the work involved horrific material. Submission 37 suggested that:

"Any civilian photographer would need to be counselled every time a grisly murder scene was photographed."

Other submissions argued that police photographers provided confidence on security issues:

"... whilst the (outsource) photographer could technically provide the same level of service ... the development of sensitive prints would be conducted in normal commercial laboratories, the staff of which might have ties with ... criminals" (116);

and that police (but not commercial) photographers were allowed unrestricted access to business premises, hospitals, etc. In other words, the police, by virtue of being the police, receive a level of cooperation that would not be forthcoming for a commercial counterpart:

"... Police photographers enjoy unrestricted access to hospitals, institutions, and business premises, in execution of their duty ... a privilege not readily available to a service contractor" (300).

Another major theme was the advantages of the photographers being sworn police staff (an eye for evidence, extra investigative resource at the crime scene, an ability to secure the crime scene against contamination, coercive powers available during surveillance) and the need to preserve the integrity of crime scenes and evidence. Submission 69 put it this way:

"It is surely a core police role to preserve, maintain and secure exhibits and to present in a Court ... the best possible evidence ... (if outsourced) ... the danger exists that contamination will take place."

Finally, there was also the argument that police would face extra costs in outsourcing, because they would lose the bulk-buying power enjoyed through coordinated purchasing policies for the in-house operation:

"Police forensic photography and video services span ... technical photography, desktop publishing, television and videography, scene of crime examination, physical match examination skills ... Police = large scale bulk purchases – equipment – consumables – processing" (300).

Submission 96 articulated a number of the arguments effectively:

"... the police department has done two comprehensive reviews of police photography with views towards civilianisation. The sole change ... was the outsourcing of developing and processing film ... Currently police are the only agency ... offering training in forensic photography to a professional level ... Any company that takes on this outsourcing would be running major risks in the ... courts due to lack of qualifications ... Coercive powers ... are certainly useful for surveillance photography, covert video surveillance installations and crime scene work ... Removal of this means a member of police with those powers has to be present at all times ... In the event of contract failure photography could not be retrievable in the short term How will they (victims) feel making an appointment with a photographer down town to get embarrassing injuries photographed. How does the doctor in a child molestation case deal with a non police photographer who they have never met or know anything about?"

Video Unit

One submission urged retention of the video unit at the Police College:

"The national video unit is the principal storage facility for all videos ... of crime scenes ... These must be kept by police as they provide an excellent training resource and are a legal record ... It is considerably cheaper for police to operate the current video unit than it is to contract this work out. A standard commercial rate for ... a 5 – 10 minute training video is \$30,000 – \$40,000. Over the 1997/8 financial year, the video unit produced 2 hours 18 minutes of video to a commercial production house standard ... on a total annual budget of \$135,000" (351).

Lost and Found

More than 14 submissions commented on outsourcing and were all strongly opposed. A major theme was the efficiency of the link between lost property and stolen property:

"What interaction would there be to ensure that stolen property was not treated as found? This is a service provided to the public that gives the community a good side of the police" (36).

The economies of multi-tasking, especially in the smaller centres, was also cited:

"Lost and Found property officers are multi-tasked and (in our) case ... lost and found property is only a small portion of the Property Exhibit Officer's workload ... I am also responsible for exhibits ... video tape library ... petty cash ... travel and accommodation ... front counter ... relieving" (254).

Positive public relations benefits were also given as reasons not to outsource:

"Lost and found property and cycle clerks are ... employees with ... a modest salary ... A large proportion of property handled by the lost & found office is that previously reported as stolen. In house access to documentation and reporting systems ... means that in many cases property can be returned to its rightful owner with a minimum of delay ... Services such as lost and found mean the NZ police are not seen just as the punitive arm of government but also as an agency willing to help" (61).

Doubts were also expressed about whether a lost and found service would be profitable for any contractor, and whether citizens would hand in found property to a private contractor (as opposed to the police):

"I see this function as a public service ... If this function is given to a private company, then that company is going to have a profit motive ... I also think that people who find property could be very wary about handing it over to a private company" (109).

Communication Centres

Five submissions commented on outsourcing communication centres and all were opposed. Reasons cited were that emergency calls were a central part of policing and there was a high volume of calls:

"Police have been going through great pain, and will continue to go through great pain, to set up these centres. In Napier we dis-established 5 positions of Beat Constables, to set up our Control Room. With the introduction of the centralised Communications Centres, Napier loses those 5 positions. I am disappointed that we should be setting up these centres, only to sell them off ... The centralisation of the

control centres, and the sheer volume of calls, means that there have been and will be problems" (37).

Concerns were also expressed about the security of any outsourced service:

"Have you considered the trauma that outsourcing would involve if contractors all walked off the job through industrial action? Where would that put fire and police?" (67).

Finally, it was pointed out that any changes regarding communication centres had to ensure that disaster response needs could be met following a major disruptive event. Submissions 244 and 360 commented on different aspects of this concern:

"The communication centres ... should be viewed as an integral part of front line policing ... Unexplored synergies will exist. The collocation of the NZ Fire Service is the initial partnership which has been formed ... Some potential partners may not wish to form a partnership should outsourcing take place ... the Emergency Service Review (Teagle Report) should also be considered in the context of this review" (244).

"It is recommended that police communication centres remain in the 3 locations as it diversifies risk of a major catastrophe paralysing police communications. Ideally, these communication centres should be located in low cost areas away from the CBD to reduce lease/ownership costs" (360).

Information Technology

Nine submissions commented on outsourcing information technology. Most recognised that some aspects of information technology could be outsourced. Submission 160 talked of 'rightsourcing' but urged the review team to allow current analyses of outsourcing to run their course:

"Consultation with some vendors has identified that the current level of service provided by the helpdesk is exceptionally high ... These vendors ... considered taking over our current operation in situ to provide the same level of service. However, they have advised that this would cost what the current operation costs are plus their management margin. In addition questions pertaining to security of police systems would need resolving ... SMC already outsources many of its activities. However, overall systems management control is retained to ensure changes don't conflict nationally, overall security is maintained, and vendor's service performance is effectively managed ... In conclusion, 'rightsourcing' is the way forward and a process is being worked through by I & T to do this properly across the wider I & T group – targeting completion by December 1988 ... Until this exercise is completed it is unwise to pre-empt the outcome."

One submission noted that the original reason for the I & T group was the failure of outside organisations to provide a reliable 24-hour 7-day service, and other

submissions (for example 258) voiced concerns about security problems if certain aspects of I & T were outsourced:

"My particular concern is with regard to the support given (by I & T) to the Armed Offenders Squad ... operations require the backup (for AOS equipment) of a stable dedicated and trustworthy staff with good technical knowledge of all police communications and computer networks ... I would be extremely concerned at the possible security and safety problems that would arise should any outsourcing of this support to us be contemplated."

Property Management

See PROPERTY MANAGEMENT below.

Fleet Ownership/Maintenance

A total of 34 submissions commented on outsourcing of fleet ownership or management. Some expressed doubts that outsourcing fleet ownership and leasing vehicles back would be cost effective. One suggested that the police should set up a company to own the vehicles, which would then lease them back to districts.

Those making submissions on maintenance strongly opposed outsourcing. Many referred to substandard work by private-sector garages and referred to fleet management being insourced for precisely that reason. Some submissions doubted that private garages could compete with the in-house service, because they offer a reactive (after the problem occurs) rather than a proactive (anticipate problems and prevent them) service:

"I fail to see how contracting out ... can be done ... at a lesser rate ... the contractor's role will be reactive as opposed to my role which I see as preventative" (64).

Most submissions referred to the special character and needs of police vehicles given their type and use. Submission 22 noted problems with local garages and stated:

"... the standard of service provided ... by local ... garages is substandard ... I have on several occasions rectified problems ... The garages ... are not familiar or ignore police requirements ... To ensure vehicle safety a regular maintenance check is required (weekly for frontline, fortnightly or monthly for other vehicles) ... Because of the different use to a household vehicle, tyres and steering of these vehicles wear much faster than normal and damage often occurs to suspension parts ... outside servicing will result in accidents and endanger staff and members of the public ... All minor problems need to be checked to ensure staff safety ... These problems might not show up at normal speeds but will occur at higher speed and multiply in pursuit situations ... if there is a minor problem like a faulty brake light, the vehicles will need to be driven to the garage and wait for garage staff ... staff at the police garage

know the priorities of these vehicles ... my experience is that local garages will not give the police priority ... This was one of the main reasons for the MOT setting up its own garage at the Harbour Bridge in 1990. Cost was the other main reason and big savings in front line time and money were made ... Recommend overhaul the current vehicle replacement programme so that vehicles get replaced when needed ... centralise garages in large cities ... and use satellite garages with handymen as personnel for minor repairs ... in smaller cities local garages can be used as it is now but proper control is required ... start a police owned panel & paint shop in all major centres to do all accident repairs."

Other factors mentioned were the value of knowing the history of particular vehicles, and the efficiencies of having a police garage on site giving priority to police needs and achieving a quick turnaround. Submission 107 put it as follows:

"Since the workshop is situated at the main station, there is ready access to the vehicles which can be repaired and returned to service without any delivery delays ... outsourcing is not a viable option in our case for the following reasons: reduction in fleet knowledge ... lack of flexibility by private enterprise in relation to policing priorities, downtime in vehicle delivery and pick up, risk of reduced safety, probable higher hourly cost for repairs ... and parts."

Stores

See PURCHASING SUPPLIES below.

Payroll

Four submissions commented on outsourcing of payroll. Reference was made to previous investigations and the resulting \$4.1 million PeopleSoft system that brought police payroll in-house. Reference was also made to the advantages of a close link with human resources staff and records. Submission 342 stated:

"Investigation before implementation of the present in house payroll (\$4.1 million investment) indicated that there were no savings to be achieved by outsourcing ... Post implementation savings have (since the implementation) halved actual payroll costs ... Routine payroll processing is highly automated ... The key requirements are the ability to apply the appropriate employment provisions and to adapt systems to alterations in those provisions. Employment provisions are diverse, approximately 27 different employment contracts ... Payroll staff have direct access to these contracts, personal file material, years of payment histories and other HR data. They also have access to immediate assistance with contract interpretation ... An outsource provider would not have this level of access or expertise at hand."

Submission 380 noted:

"The police have recently implemented the 'PeopleSoft' information system that brought police payroll in house. Four million dollars have been invested ... with the

return on investment being approximately four years ... It is expected that a thorough examination of the proposal to outsource will consider these facts."

One submission suggested that staff attitudes to outsourcing payroll may not be entirely within the control of police. The submission was succinct but to the point:

"No thanks. I have seen the problems the education service has with this. I don't want any part of it" (272).

Management Review and Audit

Two submissions gave attention to outsourcing this function. One submission suggested it should be outsourced, while the other cited the benefits of it remaining inhouse.

Accounting

Six submissions commented on outsourcing. Some thought that aspects of accounting functions could be outsourced. There were, however, significant concerns about timeframe and processes. Submission 349 set out a comprehensive view:

"There is no difficulty in principle with outsourcing 'accounting services' ... The difficulty lies with the proposed timeframe ... and in the looseness of the present definition of 'accounting services'... The conventional wisdom on outsourcing is to make any major internal savings before outsourcing so that the organisation and not the outsourcer secures the benefits of the more readily realised internal efficiencies. Once an organisation has made its own major internal efficiencies, the business case for outsourcing might be made because of the economies of scale available to the outsourcer ... It is also bad practice to attempt to outsource a process under change or which is a mess in the hope that outsourcing will fix these problems."

The submission then sets out the following approach:

- " National purchasing contracts would be negotiated in parallel with the implementation of the new FMIS with both coming into effect on 1 April 1999
- The systems maintenance and support function of the new FMIS could be outsourced at relatively low risk ... from the system's inception on 1 April 1999
- A centralised but internal financial transaction processing unit would support the new FMIS through at least one full fiscal cycle until 30 June 2000 by which time a robust business case might have been developed to support its outsourcing from 1 July 2000
- System control and financial management ... would not be outsourcing candidates at all."

Records

Few submissions commented specifically on records (although see "Non-sworn Staff" above). One submission (89) expressed concerns about privacy and confidentiality if this were outsourced:

"Files held here are privacy, police complaints, and policy. Given the confidential and sometimes graphic nature of the sexual and violent crime files ... I would have thought it to be an impractical idea."

Cafeteria

Seven submissions commented on this area, with most opposed to outsourcing. Advantages of an in-house service were that it was cheap to staff, cost effective, and that staff eating their meals on site was a big plus for the department – staff were effectively on call.

One submission suggested that the cafeteria was a good candidate for being outsourced.

Welfare

A total of 15 submissions commented on outsourcing welfare. Police staff voiced a strong measure of appreciation for the welfare service provided and noted the value of having someone who understands police (and police culture) providing the service. Submission 84 outlined a common view:

"... it will not be practical to have a welfare officer brought in from outside ... these people will not be able to relate to the officers because they will have no comprehension of the police psyche ... an outside welfare officer would not be accepted by staff as someone they could confide in."

Other submissions agreed on the need for an in-house service on the basis of the same rationale but considered that suitably qualified staff would be preferable to the traditional practice of appointing sworn staff as welfare officers. Submission 350:

"They (welfare services) have not always been effective due to appointment practices that promoted the appointment of untrained sworn officers to such positions. The appointment of the present coordinator ... has seen great improvements and staff welfare officers are now moving to a skilled basis with appointments of some external qualified professionals. Because of the unique nature of police welfare work, and the powerful nature of the organisational culture within police ... efforts to outsource welfare will be ineffective and not beneficial. However, the policy of appointing sworn officers to welfare officer's positions is questioned."

Some submissions doubted that alternative (outsourced) welfare services would be cost effective:

"We need these staff to talk to and listen ... The outsourcing of ... welfare officers will be a greater cost ... in the long term. It will create greater sick leave ... loss of efficiency due to lack of this support service. The staff at the moment deflect a lot of work away from the \$120 an hour services ... and they are available 24 hrs a day. The argument is often used that there are no welfare officers in any other government department, very correct but no other government department deals with the things that police do" (13).

PURCHASING SUPPLIES

Only a few submissions specifically addressed these issues. Those that did supported a single national service centre concept, and there was significant (but by no means universal) support for outsourcing district purchases.

PROPERTY MANAGEMENT

General

There was significant support for outsourcing property management, but there was also significant support for in-house property maintenance, or at least in-house property management control of outside contractors.

Those advocating in-house maintenance and control stated that knowledge of buildings (drains, boilers, etc.), poor and expensive outside servicing, and security issues pointed to the benefits of maintenance functions being retained in-house. Submissions 72 and 292 captured the flavour:

"My knowledge of in-house specific police workings eg. locking and security systems etc is something you don't get to know as a civilian contractor ... Any time an architect or consultant wants to know anything regarding buildings under my control they ask me ... I know what has been installed and where ... Knowledge on building services, airconditioning, fire alarm systems, CCTV monitoring, duress alarms in cells, heating, security etc ... I was employed for my skills and experience; I love the job I enjoy the job and I'm good at it" (72).

"The following tasks ... would be difficult to outsource to non-police personnel: Liaison with staff in regard to access and supervision of contractors .. in sensitive areas ... Building security — issue and control of all security keys and access cards ... Personnel security (i.e. cell pendants) ... Provide access when required to restricted areas ... Continually monitoring building computer to ensure all plant operating correctly ... Liaise with communication centre and area managers to ensure little disruption is caused with emergency generator and UPS testing and trial evacuations ... To ensure a high standard of building repairs (by contractors) ... I suggest that a property manager be appointed to each district" (292).

Police Housing

More than seven submissions were received on police housing. Most stated that the perceived advantages of police housing were: an incentive to get staff to live in smaller centres, staff living in their communities, and (in the case of houses attached to stations in small centres) accessibility to the public.

However, one submission (379) noted that some police received houses and others at the same location did not:

"Whilst there was an acknowledgment of 'hard to fill stations' there was also a problem of equity amongst members ie some members had access to subsidised departmental housing while others at the same station did not. In order to fill such stations there should be a living or location allowance commensurate with the relative rental accommodation rates in the area. Current building stock should be sold where possible."

TRAINING

Only a few submissions were received on training. One referred to the need for standardised training to ensure consistency of standards and compatibility (for national initiatives) in particular specialist policing areas.

Others supported the Police College in terms of training courses offered (police, not polytechs, should train police) and the inherent team-building that arises out of having a training facility dedicated to the needs of police.