



Matthew Barber
Police & Crime Commissioner
for Thames Valley

Office of the Police & Crime Commissioner
The Farmhouse, Thames Valley Police HQ
Oxford Road, Kidlington, OX5 2NX
01865 541957
pcc@thamesvalley.police.uk
www.thamesvalley-pcc.gov.uk

The Rt Hon Shabana Mahmood MP
Home Secretary
Home Office
2 Marsham Street
London, SW1P 4DF

10th June 2026

Dear Home Secretary,

Police Reform

I am writing to formally set out my concerns about a number of the proposals set out in your Police Reform White Paper. By your own admission these changes are unprecedented in scope, arguably since Sir Robert Peel set out the foundations for modern policing. This response is, therefore, a necessarily extensive one. It is supported the accompanying report that I commissioned from CoPaCC about the implications for policing in Thames Valley.

My concerns come not from a resistance to any change, but from a strongly held commitment to policing by consent in this country. I want our policing model to succeed, not for the sake of policing as an organisation, but for the benefit of the community that we all serve. I was elected to represent the interests of around 2.5 million people in Thames Valley regarding reducing crime and improving community safety. Whilst the Government undoubtedly have it in their power to abolish my role, whilst I remain in post it is my duty to speak out against plans which I think will hinder the fight against crime.

Changes to Local Policing Governance

1.1 Policing Governance is not a topic that many members of the public will generally have given much thought to, but it is an important one. Whilst I may take issue with the *failed experiment* narrative that you have sought to promote, one thing that Police & Crime Commissioners have certainly done is bring governance to the fore. It is clear, even from critics of the PCC model, that many people are not even aware that there has always been civilian oversight over our police forces, and the old Police Authority model was not just impotent, but also largely invisible.

1.2 **Abolition of Police & Crime Commissioners**

Despite the fact that constitutional changes such as abolishing directly elected public offices would normally be a matter for party manifestos, I do, of course, accept that the Government has the power to abolish the posts as they exist at the moment. I do not expect the public to mourn the loss of what they may see as *another politician* in an office which I accept is not widely understood. I will, therefore, seek to restrict my comments to the problems which the Home Office is clearly already encountering in drafting a clear alternative to Police & Crime Commissioners.

1.3 **Alternative Governance models**

The proposals, as currently understood, will further complicate the system of local policing governance as there will be several different models in operation. Directly elected mayors will continue to exercise policing functions in places such as London and Manchester – suggesting that a directly elected PCC model is fine in some areas, but strangely not elsewhere.

1.4 Some police force areas that are not coterminous with local government boundaries may have competing mayoral mandates, or forces may be part covered by both mayoral and non-mayoral areas. This will create competing mandates from those who are directly elected to oversee policing and crime versus councillors appointed to serve on a board.

1.4 In many parts of the country, including Thames Valley, there will be something akin to a hybrid between the current model and the old Police Authority. The creation of Police & Crime Boards and their appointment of a political Police & Crime Lead will cost more to operate and will add bureaucratic local government delays to decision making within policing. Decisions that can currently be taken by agreement between a Chief Constable and a PCC, are not likely to take weeks or even months for a cycle of local government meetings, officer drafted reports and statutory call-in periods. Policing governance will be less responsive to events.

1.5 **Lack of accountability**

It will also be further removed from the public. By creating Police & Crime Leads you plan simply to remove democratic accountability. The only financial saving that will be made is through cancelling a series of elections, yet we know that the estimated costs for PCC elections published by the Home Office hugely inflate the reality as they do not consider elections that run concurrently. The new Police & Crime Lead will not be directly accountable to the public, but to a group of individual councillors whose only democratic mandate may come from as few as a thousand voters.

1.6 **Voting on Police & Crime Boards**

I understand the Home Office intends to introduce weighted voting on Police & Crime Boards. This may address the complaints of some larger local authorities, but risks creating preferential consideration for resource allocation and scrutiny to the detriment of smaller, more rural, communities. There is no clarity on what weight the votes of independent members would be given on such boards. Without clear principles of decision-making, Chief Constables and, therefore, police forces will not be adequately challenged.

1.7 Lack of clarity in new proposals

It seems clear that inadequate consideration has been given to the governance changes before the publication of the White Paper and the announcement of an ambitious legislative timetable. Only after the abolition of Police & Crime Commissioners was announced did the Home Office begin engagement with OPCCs to understand how budgets are currently being spent and how responsibilities are being discharged.

1.8 Reducing local oversight of policing

The government's proposals, in conjunction with the regionalisation of forces, seem intent on undermining local policing governance. This is not by accident, it is deliberate. Strong local governance is a threat to the government's drive for centralisation and control from Whitehall. This is why the abolition of Police & Crime Commissioners was announced prior to the bulk of the reform programme as PCCs, being elected as local champions for our community, are seen as a barrier to increased central control by the Government.

1.9 Although presented as localism, the model being proposed will mean that strategic oversight of police forces comes from the Home Office or not at all. Locally elected politicians, whether they be PCCs or councillors, should only concern themselves with ultra local issues. This shows a complete lack of understanding about policing including the fact that force-level resources and strategic decisions are vital to local policing in every community.

1.8 Last month in a discussion with Lord Harris of Haringey – a Labour peer, and the first chairman of the Metropolitan Police Authority – he was clear about the governance that was needed. He stated that the ideal governance model is one that can listen to the concerns of local people, about the day-to-day issues affecting them, whilst still having strategic oversight over spending, resources and priorities. I agree, and whilst undoubtedly improvements can always be made, that model exists in Police & Crime Commissioners. Directly accountable to the public at the ballot box and therefore responsive to their concerns, yet with the powers to set force budgets, vary the Council Tax precept, provide real challenge to Chief Constable's and set a strategic direction for the police and partners.

Creation of a National Police Service

2.1 The proposed creation of a new National Police Service (NPS) is one area in which I will offer some cautious comments of support. There are areas where national mandating or a single point of command does make sense.

2.2 Data sharing and national data platforms

Some devolution of procurement can be desirable to drive competition, and Blue Light Commercial Ltd, of which I am a director, has been at the forefront a delivering efficiency for policing and other emergency services.

2.3 Mandating national data standards and data sharing has obvious advantages and whilst policing has moved some way in recent years, there are still challenges with adequately and speedily sharing intelligence and other operational information to aid the fight against crime.

2.4 This is, of course, a cautious welcome. Whilst some ability to deliver at a national level may sound desirable, we do have to question whether it is practically deliverable in the

terms set out. The replacement for the Police National Computer, NLEDS, was launched a decade ago and is far from fully delivering the vision set out. The new radio network for policing and other blue light services, the Emergency Services Mobile Communications Programme (ESMCP), is now fifteen years old and has failed spectacularly. The failure to deliver joined up policing in recent years has been a failing of the Home Office, not of police forces or the 43-force model. There is nothing in the White Paper to give confidence that new national programmes would be better delivered.

2.5 Aside from adding costs to local budgets, these national programmes have actually led to a greater diversity amongst the 43 forces. The failure of the Home Office to deliver has meant that across the country individual forces have had to patch, innovate and invest, often delivering much more effectively than the centre.

2.6 **Fighting fraud**

The threat to the public from fraud and cybercrime is growing and we know this now mixes with threats from foreign states. I have said for years that the current policing landscape is too crowded. What should be a collaborative effort often results in a lack of clarity over which organisation is responsible: the National Crime Agency, the Serious Fraud Office, the City of London Police, the National Economic Crime Centre, not to mention the investigative powers of other bodies such as HMRC. The challenges of the 43 territorial force model, where there is clear delineation of geography, looks incredibly simple by comparison.

2.7 If the intention is for the National Police Service to take on all national responsibilities, then of course it is welcomed, but I fear that instead it will simply transfer functions from the National Crime Agency and leave much of the rest of the cluttered landscape untouched.

2.8 **National Police Air Service (NPAS)**

NPAS is certainly an example of where the *Lead Force Model* has been shown to fail. NPAS fails to deliver for many forces across the country despite significant costs to local budgets (circa £2.5-3m per annum in Thames Valley). Moving NPAS into the National Police Service is the type of change that would be welcomed and would allow it to be properly funded as a national asset without recharging to local force budgets.

2.9 **Forensic Science Services**

Forensics is another area set to be moved into the National Police Service. Undoubtedly the market for commercial forensics has been fragile for some time, and there is no doubt space for the NPS to have a role. Yet, once again, we have a lack of clarity. Crime scene investigation is critical to effective investigations. Will these teams, locally based and needing to respond quickly to a range of incidents, be part of the National Police Service? If so, will local officers have the same ready access to CSI teams as currently exists, or will the NPS be able to triage requests for support? If CSI is to remain a local function, how will they interact with local or regional forensic laboratories?

2.10 None of these questions will be answered before the establishment of the NPS. It seems likely that legislation will be wide ranging and open ended. Not to enable flexibility, but because these issues simply have not been resolved.

2.11 Of particular concern to me in Thames Valley is the ownership of forensics facilities. We are nearing the completion of a new, state-of-the-art, Forensic Science Centre in Oxfordshire that will put the force at the forefront of national capabilities. Will this building effectively be commandeered by the NPS as part of its take over? Who will those staff be working for in five years' time? Their local police force or a new national agency? Of real interest to taxpayers in Thames Valley is who will pay for it. The force has committed to significant borrowing over future years to fund this new centre at a cost of circa £50m. Will the National Police Service (which currently has no budget) be purchasing that building, or will Thames Valley simply lose the facility whilst still bearing the burden of the borrowing costs?

2.12 Risk of duplication and misaligned priorities

The logic of placing these specialist functions into the NPS is to remove duplication across forces, but in fact it risks creating another tier of duplication. If the NPS manage forensic services nationally and set a threshold that is too high for local forces to get exhibits examined; or if backlogs build up, local or regional forces will recreate their own services to fill in the gaps. This risk of duplication applies in almost all areas of potential nationalisation.

2.13 The attention of the NPS will inevitably be on national, strategic threats. Therefore, they will be ill equipped to deal with neighbourhood crime. This would not matter if the sole remit of the NPS was to tackle those national threats, but it is also being designed to provide support and specialist functions for the rest of policing. With its priorities being national ones, I have serious concerns that the capabilities it would possess will be readily available to local police officers on the ground. This will mean either a worse level of policing for our community, or additional cost to provide at a local level what fails to be delivered nationally.

2.14 We already see evidence of this in the National Crime Agency (NCA). The NCA are politically being driven to tackle small boats. Not an issue that directly impacts landlocked Thames Valley. Other areas of serious organised crime that should naturally be in the NCA's remit are therefore falling to Regional Organised Crime Units (ROCU). In turn, not helped by your decision to cut funding for ROCUs, more is being pushed back to local police forces. I fear this is an insight into the future under a National Police Service.

2.15 Funding for the National Police Service

It is not clear whether the Treasury is providing additional funding for the new National Police Service. Therefore, funding will continue to be taken from local forces in order to support this new national organisation. In this year alone your department has allocated £99.6m to the Police Reform Programme. That is money that should have gone directly to territorial policing. At a cost of nearly £100m simply for the purposes of the review and preparatory work, the actual costs of the new NPS once it requires buildings, staff and support functions will be vast. With no new money, this is cash, which effectively means police officers, being lost from local police forces.

Regionalisation

3.1 I have contributed directly to Lord Hogan-Howe's review of police forces but must raise serious concerns about your ambition for wholesale change which is likely to damage local policing across many parts of the country.

3.2 I will acknowledge the real issues amongst the few very small forces, but your programme of work, and the very appointment of Lord Hogan-Howe himself, shows a desire not to fix the problems that exist, but to redraw the map for more ideological purposes.

3.3 Funding formula

Many of the smaller forces would highlight that their funding per head of population is significantly lower than other areas. It is not necessarily their size that is the problem, but the funding formula that penalises them. The first stage of any review should be to look again at how the Home Office funds local policing, and then possibly to consider some geographical changes subsequently if required.

3.4 There is a correlation between smaller geographical forces and those that have in recent years received additional financial support from the Home Office. This is not a factor of their size, but of the income, a matter that is in the hands of the Home Office to review.

3.5 I would add that Thames Valley falls in the lower half of the table when comparing police force funding. This places a greater burden on local taxpayers than on better funded forces and has already driven huge savings from the organisation.

3.6 Cross border crime

There are challenges of cross border policing in some areas, but these are largely down to the ability to easily share intelligence and other data between forces. If the NPS is actually able to ensure the free sharing of information (2.2 above, then much of the reasoning for force mergers falls away.

3.7 Whatever shape police forces take there will always be borders. Within your vision of creating a patchwork of more autonomous Local Police Areas, you will be creating a much greater volume of border between command areas than currently exists between force.

3.8 The Metropolitan Police

The largest force in the country has not only some of the worst performance outcomes but also displays some of the worst cultures within policing. Whilst not exclusively, the problems that the Metropolitan Police experience are often caused by size. This was an issue identified by the Casey Review regarding command areas. At a force level, the Metropolitan Police is simply too large to be effectively managed. Whether it is about tackling crime, upholding standards or simply preventing leaks to the media, this is one of the worst police forces in England and Wales, and it is an example that should not be followed.

3.9 The importance of localism

Inherent in the regionalisation programme is a lack of localism. This is acknowledged in the White Paper, and the idea of Local Police Areas (LPAs) seems to have been inserted to address the complaint. It does not adequately do so. In Thames Valley Local Command Units already exist, and they certainly do allow for some level of local variation to delivery. However, both high-volume crimes such as retail theft, and high harm crimes such as domestic abuse require strategic support at a force level.

3.10 Rather than simplifying the number of forces, if LPAs are given the level of autonomy suggested, this reform will create hundreds of micro-forces, incapable of dealing with real issues in our community and a new regional tier removed from local concerns and focused on larger strategic threats.

3.11 Size of Local Policing Areas

Across the country there is a huge variety in the geographical and population size of command areas. In Thames Valley specifically we have recently moved away from a model of 13 Local Police Areas to one with 5 Local Command Units. That change has saved more than £2m, much needed considering pressures to our budgets being imposed by the reform programme.

3.12 For a new regional force to operate effectively the constituent Local Police Areas will need to be broadly the same size, indeed I expect there will be a drive for consistency nationally. I expect that the current Thames Valley Local Command Units will be seen as too large by some. As a comparator the Local Command Unit of Buckinghamshire, is significantly larger (by population and area) than the entire police force area of neighbouring Bedfordshire.

3.13 Yet the White Paper talks about LPAs being at the level of cities or large towns, significantly smaller than a county-based model. To recreate that in Thames Valley alone would add circa £2m in costs per annum and hinder the improved performance that we have seen. Chief Constables would be stripped of their operational autonomy to organise their own force in favour of a one size fits all model.

3.14 Any wholesale reorganisation of forces will create years of confusion and chaos and add many millions of pounds worth of costs into the system without bringing any benefits to the public. Reform can be delivered if there are clear operational benefits. The LPA model is being artificially added in to the reform programme as a mitigation for the flawed vision of regionalisation.

3.15 The transition costs, which will be significant, and without backing from the Treasury, will impact frontline budgets at a time when they will already be top sliced to fund the NPS.

3.16 In addition, little consideration has been given to how the Council Tax precept will function. In areas such as Thames Valley, the local taxpayer is directly contributing almost half of the cost of local policing. Each year the Government put more pressure directly on council taxpayers rather than funding policing from wider general taxation. Extraordinarily, the impact of Council Tax is explicitly outside of the remit of the Hogan-Howe review into forces. The Government has commissioned a significant – and expensive in its own right – piece of work to justify an intended policy and yet will get to the end of that process with no clearer idea as to how the model will be funded.

3.17 Almost any merger scenario for Thames Valley will mean that, through Council Tax equalisation, residents will end up paying more, for a lower level of service, more remote from their own community. That is simply unacceptable.

3.18 Where so called, *System Leaders*, have sought to address this issue they seem to be proposing something akin to the poll tax, a flat levy across the country.

3.19 The reality is that Governments of all colours have recognised for years that the current funding formula is not fit for purpose but have failed to grip the problem. This reform programme will fail without fixing the allocation of funding, and if you can fix the allocation of funding, many of the drivers for reform fall by the wayside.

Licence to Practise

4.1 The Licence to Practise is a solution looking for a problem. It is presented in the White Paper to improve standards, yet it will only hamper the ability of the police to fight crime.

4.2 Training

We all want well trained police officers, but we also need to recognise that, unlike organisations such as the military, training comes at an opportunity cost. Officer training must be fit for purpose and maintained at a level that makes abstractions from frontline duties manageable.

4.3 In recent years we have seen an increase in training requirements from the College of Policing, often combined with an increase in both duration and cost. Both put more strain on a force's capability and the latter seems only to support the budgets of the College of Policing.

4.4 There are adequate mechanisms within the current Police Regulations that allow Chief Constables to dismiss or discipline officers for poor conduct or poor performance. This can include failure to undergo or failure to follow training.

4.5 Costs of the Licence to Practise

Where the model of Licence to Practise has been rolled out in other sectors it has created organisational costs, not to mention individual cost to post-holders. Midwives, for example, are expected to pay £143 each year to maintain their Licence to Practise. Will a similar financial burden be placed on police officers? Or will police forces have to bear this additional cost? In the case of Thames Valley, that would be more than £715,000 each year taken from local budgets, before you consider the cost of the actual training. The impact is not better trained officers; it is fewer officers.

4.6 Licence to Practise through the ranks

If the Licence to Practise is indeed a signifier of the importance of the office of constable as claimed in the White Paper, it will presumably be essential for all holders of that office to maintain their Licence. Chief Officers should be bound by the same requirements. Chief Officers with responsibility for specialist areas should, of course, have to be suitably trained and qualified in those specialisms in order to command them. Chief Officers, who will often spend time on the frontline, will need to maintain their mandatory training on, for example, domestic abuse, in order to maintain their Licence. These are the logical conclusions of the policy if implemented with any sense of equity, but the abstraction cost for such an increase in training for Chief Officers will be huge.

4.7 Special Constables

It is not explicit within the White Paper as to whether Special Constables will be required to maintain a Licence to Practise. As they hold the office and powers of a constable then logically, they should, but many specials will understandably be reluctant to pay over £100 each year to allow them to give their time freely. If they are not subject to the Licence to Practise, then you risk creating a two-tier system.

4.8 Warrant Card

The current system of constables having a warrant card that demonstrates their legal

authority as a Crown Servant is more than adequate. The Licence to Practise does not explicitly replace that but instead works alongside. In the current regime there is clarity. Direct action by a force can suspend or remove an officer's powers. The Licence on the other hand is not as explicit. It is a bureaucratic process. A failure to pay the fee on time, the failure to attend a particular training course would invalidate a licence. Will an arrest, perhaps made off duty, by an officer who maintains his warrant card, but had a lapsed Licence for some technical reason, still be considered a lawful arrest?

Operational Independence

5.1 In announcing your proposals you stated that you were "taking back control". A trite political line, but one that is far from the truth. The proposals that you set out in the White Paper are not seeking simply to take control. You are giving yourself, and your successors, more power and control over operational policing than any of your predecessors have ever had.

5.2 The current proposals will put a legal duty on Chief Constables to comply with directions set out by the Home Secretary. Reference is made to the Policing Protocol to establish the bounds of operational independence, but this is only secondary legislation. If this government is allowed to legislate for a statutory duty to comply being placed on Chief Constables, it would be incredibly dangerous to allow the definitions of such a duty to be amended by secondary legislation, without the express will of Parliament.

5.3 The lack of clarity around the governance of the National Police Service risks greater political direction of policing, as already exists with the National Crime Agency. In turn, if the Commissioner of the NPS has powers to direct Chief Constables of other forces, we see a further risk of operational independence being compromised.

5.4 Operational independence is an integral part of policing by consent which appears to be at real risk. These changes are not those which could be easily undone, and the damage could leave us all both feeling and being less safe in the future.

Wider context

6.1 I will not elaborate here on the significant funding pressures facing policing. Rather than putting more money into the frontline, I believe the Police Reform programme will simply swallow up more money for several years through the creation of new bodies, with local forces being left to foot the bill. The Neighbourhood Policing Guarantee is only funding 40% of the cost of new officers in this year, yet the Home Office can find hundreds of millions of pounds for other projects that do not directly support policing in the community.

6.2 Changes to the criminal justice system through the Sentencing Act will place a greater burden on policing, but what is more serious is that they will almost certainly lead to higher rates of crime and more people becoming victims.

Conclusions

7.1 I have grave concerns about your Police Reform plans. Some changes will lead to worse governance, some will lead to fewer resources and I fear poorer performance, and some will fundamentally damage the nature of policing in our country.

7.2 I accept that these changes are within the power of a government with a large parliamentary majority, but I would urge you to consider the implications, not just for the organisation of police forces, but for the public that we all serve. The risk is higher levels of neighbourhood crime and a system of policing that the public has less trust in and feels more remote from their lives and their community.

7.3 The worst of these impacts could still be mitigated with changes to the legislation planned for later this year. There is still plenty of time for a change of course in the interests of keeping the public safe.

Yours sincerely,

A handwritten signature in green ink, appearing to read 'Matthew Barber', is positioned above the typed name.

Matthew Barber
PCC for Thames Valley