HMICFRS

Her Majesty's Inspectorate of Constabulary
and Fire & Rescue Services

Regional Organised Crime Units

An inspection of the effectiveness of the Regional Organised Crime Units

Contents

Summary

In this inspection, we examined how effectively and efficiently the Regional Organised Crime Units (ROCUs) tackle the threat from serious and organised crime (SOC).

We wanted to see how well ROCUs led the response to SOC while working with local police forces and other law enforcement agencies.

We make six recommendations and raise one cause of concern to further improve the effectiveness of the ROCU network. These are set out in the next section.

We found evidence of some good work, but we also found inconsistencies across England and Wales in the resourcing, leadership and operation of ROCUs.

Our last inspection report on ROCUs was published in 2015. Since then, the ROCU network has made substantial progress in some areas, particularly in cyber-crime and undercover policing, which have received specific funding.

But the major finding from this report is the lack of a clear and sustainable funding model to make sure the ROCUs are a central part of achieving the 2018 Serious and Organised Crime Strategy.

We highlighted the ROCU funding model as a problem in our 2015 report. The National Audit Office highlighted similar problems in its 2019 report on tackling SOC, saying: "Despite ongoing efforts to improve them, governance and funding arrangements remain complex, inefficient and uncertain. Unless the government addresses these issues there will continue to be a mismatch between its ambitious plans to respond to serious and organised crime and its ability to deliver on them."

A single, whole system approach

The government's 2018 Serious and Organised Crime Strategy, which we refer to as 'the SOC strategy' in this report, sets out how the ROCU network will work with the National Crime Agency (NCA), police forces and external organisations to adopt a single, whole system approach.

In general, we found that ROCUs had good access to intelligence and performed well, despite dealing with many disparate IT systems. ROCUs remain focused on the pursue (prosecution and disruption) strand of the SOC strategy. Each ROCU is developing performance regimes and is working to create a management information system for recording performance data.

In some cases, we found that ROCUs were dealing with threats that were of a lower level compared with police forces.

Accountability and oversight

There is no effective national oversight framework capable of mandating what the ROCU network should do. As a result, we found inconsistencies in many areas of ROCU activity. All units have similar regional governance structures, but these were inconsistently applied. This has the potential to undermine national and regional tasking and co-ordination.

More needs to be done at the national and regional levels to make sure the structure and leadership of the ROCU network is consistent and can effectively tackle the threat from SOC, wherever it occurs in England and Wales.

We found some examples of innovative work being shared locally and between specialists. More could be done to ensure that ROCUs implement good practice nationally.

We were concerned at the lack of awareness or evidence of counter-corruption measures across the ROCU network, given the sensitivities of the units' work. Some ROCUs had plans to tackle corruption, but these were not consistent across the network.

More needs to be done to co-ordinate the national messages to the public about SOC. A more consistent approach will help raise public awareness of the threat. The ROCU network could contribute to this by ensuring consistent messages across all regions, adopting a similar approach to the one used for policing terrorism.

Resourcing capacity and workforce

Given their importance in the fight against SOC, we are disappointed that we still do not see any clear long-term funding model for ROCUs. This affects ROCUs in a variety of ways. To pick just one example, uncertainty about funding streams from one year to the next makes it harder to recruit and retain skilled staff. The lack of a sustainable funding plan has made the ROCU network less effective than it could have been.

Recommendations

- By March 2021, the Home Office should consider what changes to legislation can be made to allow the NCA to formally task ROCUs.

- By February 2023, the National Police Chiefs' Council (NPCC) lead for SOC, with the Home Office, should devise a technical solution to make exchanging sensitive intelligence between organisations more efficient, and then encourage its adoption and adherence by all relevant forces and the NCA.

- By February 2022, chief officers responsible for SOC in each region, with the chief officers of the affected forces, should make sure that systems are in place for senior investigating officers (SIOs) and lead responsible officers (LROs) to work effectively together.

- By February 2022, the chief constable with the lead for SOC in each region, with the chief officers of the affected forces, should ensure that a chief officer is appointed with responsibility for each ROCU, as far as practicable working autonomously of force responsibilities.

- By August 2021, the NPCC lead for ROCUs, with the NPCC lead for counter corruption, should publish an anti-corruption strategy for ROCUs and then encourage its adoption and adherence by all relevant forces.

- By February 2022, the NPCC lead for SOC should design a national function that can make sure ROCUs operate in a co-ordinated and consistent way across England and Wales; the Home Office and other relevant interested parties should adopt the arrangements so devised and provide the necessary resources to ensure their successful operation.

Cause of concern

We found that the complexity and short-term nature of ROCU funding has a significant detrimental effect on how well they operate. We also found that local interests, rather than regional and national threat, risk and harm, affected prioritisation.

Feedback from across the ROCUs, from senior managers to frontline staff, consistently identified funding as their top concern. This was echoed when interviewing national leads.

Business leads find it difficult to plan, staff face uncertainty about the tenure of their posts, ROCUs struggle to attract and retain talent based on fixed-term arrangements and they can't invest effectively in specialist capabilities. This is neither effective nor efficient and is a cause of concern.

Recommendation

By February 2022, the Home Office should lead work with the NPCC and the Association of Police and Crime Commissioners (APCC) to identify a sustainable funding model for ROCUs that:

- provides long term clarity and certainty to the financial position of the ROCUs, to allow for future business planning and more financial stability; and

- enables ROCUs to lead the response to SOC in their region.

Introduction

About HMICFRS

Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire and rescue services – in the public interest.

In preparing our reports, we ask the questions that citizens would ask, and publish the answers in an accessible form, using our expertise to interpret the evidence and make recommendations for improvement.

Context

The pervading threat of SOC remains one of the greatest problems for policing in the UK and overseas. In 2018, the Home Office estimated that organised crime costs the UK at least £37 billion annually.[1] The true scale of the threat is likely to be much greater. Law enforcement capacity needs to be increased and must continually evolve to keep pace with the threat.

The government's 2018 SOC strategy uses a '4P' approach to tackle SOC:

- To **pursue** offenders through prosecution and disruption;
- To **prepare** for when SOC occurs and mitigate impact;
- To **protect** individuals, organisations and systems; and
- To **prevent** people from engaging in SOC.

It also includes an objective to establish a single, whole system approach to tackling SOC. The strategy aims to equip the agencies involved in tackling SOC to play their part in "**a single collective endeavour**".

The main categories of SOC are:

- child sexual exploitation and abuse;
- illegal drugs;
- illegal firearms;
- fraud;
- money laundering and other economic crime;
- bribery and corruption;
- organised immigration crime;

---

[1] Serious and Organised Crime Strategy, Home Office, November 2018, p7.

- modern slavery and human trafficking; and
- cyber-crime.

The Strategic Policing Requirement (SPR) defines ROCUs as: "the primary interface between the NCA and policing, supporting the co-ordination and tasking of the collective effort against the serious and organised crime threat."

The 2018 SOC strategy further explains the direction of development for ROCUs: "to lead the operational response to serious and organised crime on behalf of forces within their regions, taking tasking from the NCA on national priorities, and working together in a more networked way, allowing capacity and capability to be shared where appropriate."

Organised crime group mapping and management

According to the NCA's National Strategic Assessment of Serious and Organised Crime in 2019, there are more than 4,500 recognised organised crime groups (OCGs) operating in the UK.

There is a national process for identifying and prioritising these groups. A database holds information on OCGs, including type of criminality, the complexity and sophistication of the group, and its membership. Intelligence on these groups is regularly reviewed. The ROCU network is responsible for applying and co-ordinating this OCG mapping locally and regionally.

ROCU structures and roles

ROCUs were established in 2009 and there are nine units across England and Wales. Each serve between three and seven constituent forces. (See appendix 1 map). The Metropolitan Police Service, City of London Police and British Transport Police work collaboratively to tackle SOC, but they do not currently have a ROCU, though this is being considered.

The primary functions of a ROCU are to provide a range of specialist capabilities[2] to forces and to lead the regional response to SOC.

Since they were introduced, ROCUs have evolved and have grown considerably, in both the level of their resources and the type of specialist work they undertake. This is in line with national strategies to respond to the growth and complexity of SOC.[3] As a result, ROCUs are far bigger organisations now than they were when they were first established.

---

[2] These include covert operations, surveillance, undercover policing, confidential unit, regional asset recovery team, cyber, operational security, government agency intelligence network, prison intelligence and SOC operations.
[3] The additional core capabilities now include asset confiscation and enforcement teams, undercover online, Government Agency Intelligence Network disruptions, regional organised crime threat assessment, dark web investigation teams, digital investigations and intelligence, child sexual abuse and exploitation, human trafficking, modern slavery, serious violence and county lines.

Police and crime commissioners (PCCs), and the chief constables from their local police forces – which provide most of the funding – hold each ROCU to account. Additional funding comes from grants from the Home Office and numerous other small grants.

The development of each ROCU is overseen by an executive board, which a chief officer leads. These boards come under the governance of the national SOC programme board and the NPCC lead for SOC is the board's chair.

A chief officer oversees the senior command team of each ROCU and has overall responsibility for the unit. A head of ROCU leads the day-to-day management of each unit and sets the strategic direction with their senior team.

The ROCUs we visited all had a sensitive intelligence unit and varying levels of operational capability to investigate and disrupt OCGs that operate across police force boundaries.

ROCUs play an important role across law enforcement, linking the local response to SOC with the work that the NCA undertakes.

Our commission

The SPR highlights SOC as one of the UK's national threats. The SPR outlines the structure for the policing response to counter these threats. This inspection was designed taking account of the SPR and specifically the capability, capacity, consistency and connectivity of the ROCUs to tackle SOC.

With this approach in mind, the terms of reference for the inspection were as follows:

- Do ROCUs have the **capability** and **capacity** to tackle the threat from SOC?
- Is there **consistency** across different regions and forces?
- How well **connected** are the ROCUs?

Developments during our inspection

All our field work was suspended on 13 March due to COVID-19. At that time, we had inspected five of the nine ROCUs.

After consultation with the Home office and the ROCU executive board, we decided to delay publication of the ROCU inspection report until we could inspect two more ROCUs. Inspection work resumed in September 2020.

Methodology

This was a thematic inspection of the network and we have focused our report on strategic issues, not on tactical or operational matters.

In a letter dated 19 December 2019, we wrote to inform all ROCUs, police forces, the NCA and interested parties of our intention to inspect the ROCUs.

We conducted scoping interviews with ROCU and SOC portfolio leads and other interested parties between January and February 2020. We gathered data from each of the ROCUs and requested information from all police forces and the NCA.

Between January and March 2020, we engaged with Sir Craig Mackay and the team commissioned by the Home Office to review SOC.

We reviewed more than 280 documents that the NPCC, NCA and ROCUs provided. These included organisational charts, strategic risk assessments and delivery plans.

Between 21 February and 13 March, we attended five of the ROCUs (South East, Yorkshire and the Humber, West Midlands, North West and Eastern Region). After the suspension of inspection activity due to COVID-19, we then inspected the North East ROCU and the East Midlands specialist operations unit between 7 and 18 September. We used a common set of questions and held a series of interviews and focus groups with staff in similar roles across the different ROCUs.

Following this fieldwork, we conducted several national-level interviews with people with strategic responsibility for tackling SOC.

We are grateful to those who gave their time freely and willingly to help us understand the full range of issues across the network.

A single, whole system approach

This chapter covers

- tasking;
- effective collaboration;
- intelligence;
- 4P approach; and
- performance management.

Establishing a single, whole system approach is one of four objectives of the SOC strategy.

This approach would help ensure that forces, ROCUs and the NCA are consistently dealing with the right level of threat and harm. This is not currently in place across all regions. As one part of a wider system, ROCUs cannot achieve this alone and the network needs to work with the NCA, police forces and other interested parties.

Tasking

During this inspection, the ROCU network was implementing a new system of tasking under a multi-agency development that the NCA was leading. This is still at a very early stage and we were not able to assess the effect it will have. So, we were only able to inspect the current model.

There is an annual national strategic tasking and co-ordinating group meeting for SOC, at which a chief constable from each of the regions represents their regional forces and ROCU. This is where members agree national priorities, as set out in the national strategic assessment.

The chief officer with responsibility for each ROCU should attend the SOC national tactical tasking and co-ordination group (TTCG).

The NCA, ROCUs and their constituent forces all have their own TTCG meetings that decide how their resources will be prioritised.

Across the network, strategic and tactical threat assessments, which set out the priorities for each region, underpinned the TTCG processes. Even though these assessments are often similar and aligned with the national threats the NCA identifies, occasionally, they are different. This affects prioritisation and creates a tension between national and local priorities.

Under the Crime and Courts Act 2013, the NCA is only empowered to task police forces, not ROCUs.

These anomalies in the governance and tasking process mean the NCA and ROCUs are less effective at making sure the highest threats are prioritised, and the right resources deployed to tackle them.

<div style="background:#f9e0db;padding:1em">

Recommendation 1

By March 2021, the Home Office should consider what changes to legislation can be made to allow the NCA to formally task ROCUs.

</div>

We also found the effectiveness of regional tasking was limited because the chief officer with responsibility for the ROCU lacks the mandate to task the ROCU's constituent forces. We found evidence that the process often amounts to "ask not task". This will be discussed further in the Governance chapter below.

We were disappointed to find that each ROCU TTCG meeting was scheduled in isolation, with apparent disregard for any national rhythm that might be required. Some were held monthly, others every six or 12 weeks. This makes national prioritisation more complex.

Many interviewees told us that forces seemed reluctant to refer appropriate operations to the ROCU through their TTCG process. One chief officer told us that prolonged negotiation is often required to remedy this, outside the TTCG process.

We were told that there was no consistency at regional TTCGs because each force is in control of its own process for prioritising activity to tackle SOC. Forces pick and choose what they want to escalate to ROCUs, sometimes choosing to do so simply because the operation has become "difficult and complicated". As a result, forces are often dealing with higher-threat OCGs than their corresponding ROCU.

The ROCUs with better tasking processes used them more frequently, with the correct level of representation at meetings. We were told that these ROCUs are tackling the highest harm issues, as designated by their TTCG process. One ROCU asked each of the representatives from the forces and other organisations to present their current highest-threat SOC issue to the TTCG. This is an effective technique that created a collective approach to problem solving.

While it is good to see the presence of strong working relationships, the public would expect action to be prioritised effectively against the most serious crime. The process for prioritising action should be systematic and built on strong, established processes, not driven by relationships, negotiation and persuasion.

Some allocations of resources sit outside the regional TTCG process. In specialist capabilities such as cyber-crime, where funding had been allocated and there was strong national governance, we found this worked well.

While the new system of tasking is at a very early stage, the signs were encouraging, and this may lead to a far better process.

Effective collaboration

ROCUs provide the link between the NCA and local police forces. They also work closely with other organisations in the criminal justice sector.

We found inconsistent approaches to collaboration and working together. For example, some forces are reluctant to co-operate on recruiting into ROCUs. There is a national shortage of specialist skills, not helped by the shortage of detectives across the UK, and we were disappointed to find such unhelpful practices within regions.

In some regions, the ROCU and NCA have become a cohesive unit. But this is not always the case and even when co-located they have not always integrated effectively. In one region, the NCA and the ROCU have frequent joint tasking meetings for surveillance operations, where they pool their resources. To improve working relationships, the NCA has a strategic lead for deploying NCA resources. This person is referred to as the regional organised crime co-ordinator and they are the designated link between the two organisations.

There is good evidence of staff from other agencies working in ROCU premises on a regular basis. They are referred to as 'embeds' and are often from other law enforcement agencies such as Border Force and Her Majesty's Revenue and Customs (HMRC). But ROCUs have not consistently adopted this practice across the country. We were disappointed to find that other agencies had removed their staff from some ROCUs. For example, the regional asset recovery teams were set up to be multi-agency units, but some non-police organisations have now left. We were told some of this had occurred as a result of organisations shrinking and budgets reducing.

During this inspection, we found chief officers could do more to improve collaboration. For example, ROCUs have to spend a considerable amount of time justifying the work they do in each force area. We also found examples of forces holding back on recruitment processes for the ROCU.

We have highlighted the difficulties of the 43-force model in earlier reports, including State of Policing 2019.

Intelligence

In general, regional intelligence units are well established and effective. But we found that staff in most of the ROCUs we visited had to work with multiple intelligence systems in different forces. We found that the process for exchanging some sensitive intelligence was inefficient, mainly due to limitations in technology. For example, hard copies of intelligence reports are still being moved across the country. This is inefficient and unacceptable. Despite the progress that has been made, more needs to be done to improve digital access to sensitive intelligence across the network and other agencies.

Recommendation 2

By February 2023, the NPCC lead for SOC, with the Home Office, should devise a technical solution to make exchanging sensitive intelligence between organisations more efficient, and then encourage its adoption and adherence by all relevant forces and the NCA.

In some cases, a lack of researchers and analysts makes it hard for ROCUs to understand the full intelligence picture for SOC. We were also told that difficulties accessing some systems such the Serious Fraud Office database were a barrier to building a comprehensive intelligence picture.

A good example of a whole system approach and access to intelligence is GAIN (Government Agency Intelligence Network). This is a multi-agency network mainly made up of public sector agencies, set up to exchange information about organised criminals. There is a GAIN team in each ROCU, led by a GAIN co-ordinator.

Forces request access to specialist ROCU resources through a single point of entry, referred to as the 'Gateway process'. A specialist team in each ROCU, made up of ROCU officers and the GAIN co-ordinator, manages this process. These teams receive requests for support from forces and other agencies. They assess the requests and, where appropriate, prioritise them for intervention using ROCU or other agencies' resources. The team provides the results of the assessment to the ROCU tasking and co-ordination process, or to a covert commissioning services meeting. Both of these involve staff from the ROCU, its constituent forces, the NCA and other agencies.

One ROCU we inspected is working with the NCA to identify new and emerging threats. It then considers how effective existing resources will be at responding to these threats in the future. We did not see this in all regions and would encourage other units to adopt this approach.

All ROCUs have a regional organised crime threat assessment process. The assessments produced give units an overall picture of risk, threat and harm across the region. As part of the assessment process, all of the region's identified OCGs are scored using the nationally recognised MoRiLE (Management of Risk in Law Enforcement) assessment tool.

4P approach

ROCUs, like other law enforcement agencies, are expected to use the principles of prevent, pursue, protect and prepare, known as the 4Ps approach, in tackling organised crime. We found that all the ROCUs are primarily focused on the pursue element of this approach.

Constituent forces are also responsible for managing organised crime using the 4Ps approach. They should do this by working with other interested parties such as local authorities. ROCUs can provide forces with intelligence and specialist investigative resources, which have been brigaded into regional capability and are not always available within the force.

When an OCG is escalated to the ROCU from a force, the ROCU allocates a SIO. The SIO decides on the appropriate tactics to disrupt the OCG. However, the OCG remains with the LRO in the force, who is responsible for maintaining a 4P plan. The SIO and LRO must work closely together to make sure there is a joined-up approach to targeting the OCG. We found some evidence that SIOs and LROs weren't always working together as effectively as they need to in order to reduce organised crime and its effect on people and communities. To assist with this, there should be forums in each region that SIOs and LROs attend to share best practice.

While ROCU operational teams are focused on pursue, we found some evidence, particularly in cyber-crime, of work in the prevent, prepare and protect elements of the 4Ps. For example, one ROCU had designed a presentation about staying safe online and taken this into schools across the region. In its first year, this was viewed by 1,200 students, in the second year 10,000 and in the third year 70,000 students. Another example was fraud teams regularly providing information to business partners in the finance world, as well as looking for secondary victims in relation to fraud in larger ROCU operations. We see this as good practice and encourage ROCUs to adopt these approaches more widely.

Recommendation 3

By February 2022, chief officers responsible for SOC in each region, with the chief officers of the affected forces, should make sure that systems are in place for SIOs and LROs to work effectively together.

Niche/specialist capabilities

The SPR expects PCCs and chief constables to work collaboratively across force boundaries. They should find the best and most affordable way of working together to meet operational needs.

The SPR encourages co-operation and combining resources to provide a national network of regional capabilities, such as the ROCU network, to disrupt SOC.

Where several forces collaborate to provide specialist resources, people and equipment through ROCUs, this can improve efficiency and effectiveness.

Police forces contribute towards the cost of maintaining their ROCU and most also contribute police officers, staff and equipment. This often includes providing some HR and finance support. A small number of forces specified the number of officers and staff they would permit to work in the ROCU. Once these forces have reached their quota, their officers and staff cannot apply for vacant ROCU posts. This undermines the ability of the ROCUs to select from the best pool of candidates from across the region.

To provide greater flexibility, fairness and to make sure the best candidates are recruited, we believe that ROCUs should be able to recruit into vacant posts from any force in their region. We consider that this approach could be extended to allow recruitment from beyond their own region. This already happens on an ad hoc basis, but a more consistent policy could be applied across the ROCU network. This would

encourage the best candidates to apply and would extend the pool of talent. It would also allow for good practice, innovation and operational experience to be spread more widely. This already happens in counter terrorism (CT).

The number and uses of specific resources vary widely across ROCUs. For example, in managing investigations, some:

- led many investigations;
- led few, but co-ordinated and supported many using specialist staff and equipment; and
- concentrated on specific investigations because of the expertise, specialist equipment and support from other agencies that only they have access to.

In some regions, ROCUs do not have the operational teams they need to lead the regional response to SOC effectively.

All ROCUs have an economic crime team and various smaller financial specialist teams. We were told that police forces expect the ROCUs to take on the most serious and complex fraud cases. Typically, these crimes require lengthy expert investigation. The level of investment that ROCUs had made in staffing these teams was inconsistent.

In our April 2019 report Fraud: Time to choose, we recommended that ROCUs receive refreshed guidance on their role in tackling fraud. It was disappointing that some specialist fraud staff in different ROCUs stated:

- they had not received this;
- nothing had changed as a result; and
- there had been a further reduction in staffing levels since the report.

We find it difficult to see how a ROCU can function effectively and efficiently without this important resource.

Police forces recognise that ROCU officers and staff have the skills and resources needed to investigate high-level cyber-crime effectively. Specialist units within ROCUs generally investigate the crimes that could only be committed using a computer, often referred to as cyber-dependent crime. Police forces, on the other hand, deal with traditional offences that have been enabled using digital devices and the internet.

Most ROCUs told us they had enough resources to deal with cyber-crime. ROCU cyber-crime teams run an assessment spreadsheet that is available to the NCA's National Cyber Crime Unit to assist with national tasking. We found evidence that ROCUs are developing productive working relationships with business and academia.

ROCUs have achieved much since our earlier inspection on the police response to cyber-crime, including increased capability and a revised performance framework.

Due to dedicated funding, ROCUs generally had access to more specialist equipment and in greater numbers than their constituent forces. Forces can request access to this equipment through the ROCU. For example, the ROCUs provide nearly all the services that rely on specialist technical equipment, such as undercover online and

technical support units. But in some areas, not all forces were fully collaborated on technical support.

Forces must be willing to agree on capital investment to achieve economies of scale and develop a whole system approach. They should also agree on access to this specialist resource to promote trust and confidence.

Performance

All ROCUs have some form of performance regime and most were improving their processes for collecting data and assessing the outputs and outcomes of their work.

Every ROCU has developed a slightly different way of measuring its performance. Some local performance measures have been designed to demonstrate ROCUs' worth to their constituent forces. This is instead of capturing how effectively they reduce the threat from SOC across the region.

We were repeatedly told that the performance of the ROCUs was not effectively captured because, in the main, the outcomes of pursue activities were measured. Information gathered was also mostly quantitative, not qualitative, making it difficult to produce meaningful impact assessments.

We found some limited examples of ROCUs capturing performance data beyond their pursue activity. People attending public presentations by fraud and cyber-protect teams were subsequently asked to complete questionnaires to record how their behaviour had changed. But this information has not been linked to any specific reduction in offences, nor were the results used effectively as part of any performance assessment processes.

Some of the people we spoke to told us that the executive board was a forum where each unit faced some performance scrutiny. But the lack of a national authority or consistent performance measures meant that the boards' effectiveness in holding ROCUs to account for performance was limited. This means that most scrutiny comes from local chief constables and PCCs. This further reinforces the localism that drives ROCU behaviour.

ROCUs have started to record performance data on a system that other law enforcement organisations working to tackle SOC use, called the Agency & Partners Management Information System. The network operations capability centre, a function of the executive, monitors and reports on the system. We believe this approach could lead to an improved performance framework for the network and result in greater scrutiny of ROCU performance. But this will only work if everyone uses it, both locally and nationally. The NPCC lead for ROCUs has committed to ensuring all ROCUs report through this system by the end of the year.

Accountability and oversight

This chapter covers:

- structures;
- national governance;
- regional governance;
- countering corruption;
- communication; and
- central co-ordination.

ROCUs have developed independently and have different operating models.

We found evidence that ROCU staff members were unclear on the role of their units. The SOC strategy states that the ROCU should lead the regional response, but this is not the case in most regions. Instead, ROCUs were often considered to be supporting the efforts of their constituent forces in tackling SOC.

We found some examples of strong leadership trying to support a whole system approach and improve the way ROCUs operate. We saw, for example, improvements in operational teams and better integration of some specialist services. But there remains evidence of a tension between national objectives and priorities and those of some forces. This affects how ROCUs are governed.

Structures

The NPCC, in co-ordination with the NCA, leads the police response to SOC. The NPCC represents all UK police forces.

It draws on the efforts and expertise of chief officers around the country to co-ordinate the operational response to the threats UK policing faces. This activity is managed through 11 committees. One of these is the crime operations committee, which is sub-divided into 12 portfolios and SOC is one of them.

A chief officer responsible for ROCUs chairs a national executive committee and reports back to the NPCC SOC lead. Chief constables and PCCs also hold ROCUs accountable locally. But having different governance structures for holding the ROCUs accountable can be frustrating and conflicting for the staff involved.

National governance

In addition, many other NPCC portfolio areas have an influence on SOC and ROCUs. This has led to complex governance across different crime types. We found examples of strong national governance within some crime areas, such as introducing protect and prepare leads for cyber-crime. This would be an equally useful approach to tackling the threat from fraud, a high proportion of which is cyber-enabled. A national governance structure, with identified leads producing and promoting a 4P approach across all the identified threats, would provide clarity for staff.

Opinion is split among ROCUs on the effectiveness of national oversight and governance. The units with better resources had a more positive view on national leadership. This was because they felt better able to respond to national priorities and demands made of them.

Many regions had a chief officer lead who was autonomous of force responsibilities and was the dedicated lead for ROCU or SOC and other regional matters such as CT. This individual has no, or limited, dual responsibility to a force and is therefore arguably able to make decisions and lead the ROCU, less influenced by force concerns.

A small number of ROCU chief officer leads had significant force responsibilities, which affected their role as ROCU lead. Assistant chief constables (ACCs) have different roles and responsibilities across the country. But some perceived that the ACCs who have significant responsibility to a role within a force, such as head of crime, as well as being head of ROCU, were not being independent enough.

We consider it good practice for ROCUs to have a senior officer dedicated to regional responsibilities.

Recommendation 4

By February 2022, the chief constable with the lead for SOC in each region, with the chief officers of the affected forces, should ensure that a chief officer is appointed with responsibility for each ROCU, as far as practicable working autonomously of force responsibilities.

Regional governance

ROCUs are units formed of staff from the region's forces. Some use a model where staff must leave their own force and become members of the ROCU's host force. In others, staff members' home force continues to employ them but they work within the ROCU under the administration of a lead force.

Force chief officers were predominantly interested in what ROCUs were doing in their force, rather than in the wider region. We were told that this was often seen in regional meetings. Chief officers were concerned with getting value for their force's investment, rather than any scrutiny of the ROCU's effectiveness in dealing with regional crime. While it is important to ensure the ROCUs are providing value for money for each

force, there is a balance to be struck. In many regions, localism and parochialism are at times outweighing regional and national priorities.

In one ROCU, all constituent forces share chief officer duties for regional roles, including tasking and co-ordination, and the performance review meetings are an example of good practice. These chief officers come together in an executive board that provides strong governance and accountability.

The use of strategic governance groups (SGGs) for different crime types across the network is extremely encouraging. Each region had SGGs at different stages of development, ensuring that ROCUs focus on the national strategic threat assessment and regional threats. The more developed SGGs are leading a more collective 4P response to SOC. Their meetings are attended by a wide range of organisations they work with, including some from non-law enforcement agencies, such as housing and immigration.

Countering corruption

The police service, including ROCUs, work to the College of Policing Code of Ethics and the standards of professional behaviour. It is vital that ROCUs have counter-corruption strategies to minimise the risk of infiltration and to protect sensitive material.

There was some evidence of counter-corruption activity, but we were concerned about the lack of awareness or evidence of anti-corruption measures. One senior officer told us they were not confident that current processes were enough to prevent corruption within the network.

The type of work ROCUs are involved in and their access to some of the most sensitive intelligence makes them vulnerable to infiltration. A coherent counter-corruption strategy needs to be in place to mitigate these risks. While some ROCUs had plans to tackle corruption, these were not consistent across the network.

Recommendation 5

By August 2021, the NPCC lead for ROCUs, with the NPCC lead for counter corruption, should publish an anti-corruption strategy for ROCUs and then encourage its adoption and adherence by all relevant forces.

Communication

The SOC strategy contains many references to the importance of communication with the public to counter the risk from SOC. ROCUs said that they had not received any guidance about how they should improve their communication with the public.

We were disappointed to find that most ROCUs had limited access to support from corporate communications or press offices. Across the network, communication with forces and the public could be improved.

The most effective communication strategies were in ROCUs with dedicated communications teams. One ROCU had a very clear 'force first' communication

strategy. This allows local forces to optimise media opportunities in their local areas from the work their ROCU has led and undertaken. The message is always based on how ROCUs support the forces. This is a logical approach showing good connectivity to tackle SOC where it relates a specific event.

One ROCU said that the Home Office has established a dial-in every six weeks with the NCA and ROCUs to join up campaigns between these and other bodies such as Crimestoppers. This must continue to ensure consistent messaging nationally about SOC.

The ROCU network would benefit from a central communications team to better co-ordinate SOC messaging across the network, improving consistency and preventing duplication.

Central co-ordination

Consistent messaging about SOC is just one example of the need for greater co-ordination across the ROCU network. Governance of performance, recruitment and working arrangements with the NCA could all be better, but the lack of central co-ordination and leadership inhibit this.

Sharing best practice and organisational learning would also benefit from more co-ordination. Individually, ROCUs are successfully targeting OCGs using innovative methods. We found examples of some staff disseminating good practice beyond their own ROCU, but there is no consistent process for accessing learning in a structured way across the network. Central co-ordination would allow for a more effective adoption of best practice.

Accountability and oversight could be improved by having a stronger central co-ordination function. This could be similar (at least in principle, if not in scale) to that maintained by National Counter Terrorism Policing Headquarters (NCTPHQ). This would include improved governance, lessons learned, improving capabilities, countering corruption and communications.

ROCUs benefit from a very small team that has tried to provide this co-ordination and leadership, but it in its current form and size, it simply does not have capacity to meet the growing needs of ROCUs or the expectations of what the network can do.

Recommendation 6

By February 2022, the NPCC lead for SOC should design a national function that can make sure ROCUs operate in a co-ordinated and consistent way across England and Wales; the Home Office and other relevant interested parties should adopt the arrangements so devised and provide the necessary resources to ensure their successful operation.

Resourcing, capacity and workforce

This chapter covers:

* funding; and
* staffing.

Funding is the single greatest barrier to ROCUs operating efficiently and effectively. Failure to address this chronic and persistent issue will leave ROCUs still struggling to meet local demands while responding to national and regional threats. The problems of financing ROCUs cannot be allowed to continue.

In our 2015 report, we said: "The current ROCU funding model makes it difficult for them to make long term plans … In order to support this long-term development [of ROCUs], the Home Office should assess the benefits and viability of a longer term funding settlement for ROCUs." We recommended that "By 31 March 2016, the Home Office – working with the ROCU executive board – should have assessed the benefits and viability of providing ROCUs with a three to five-year funding settlement that puts them in a position to make long-term investment decisions which support the development of efficient and effective regional capabilities."

This recommendation has not been met, nor has any alternative solution been reached for the long-term and sustainable funding of ROCUs.

Funding

We were disappointed that there is still no clear funding model for ROCUs. Funding streams remain as complex as they were when we wrote our 2015 report. We were told again that this is one of the main barriers to regional working. The effect is systemic across business planning and operational policing in the ROCUs. We were told repeatedly that this situation impeded the ability of ROCUs to recruit and retain skilled staff and plan for future capabilities. How to meet the cost of ROCUs and invest in their future is the main area of concern for all those involved in SOC, from chief officers to frontline teams.

One chief officer described the funding situation as the "biggest hindrance" to ROCU performance. They explained that there was no clear understanding of what grant funding would be available from one year to the next: "We don't know what we are getting. You couldn't run a company not knowing what your budget is."

A senior member of staff responsible for managing budgets also described funding mechanisms as ineffective at enabling ROCUs to do their job. They talked of a serious problem in responding to the different funding streams and described specialist co-ordination as a "complex web".

NPCC SOC leads send letters to ROCUs giving assurance that the money for various capabilities will be provided, especially near the beginning of the new financial year. But one budget holder said: "These are not worth the paper they are written on" and that the ROCU did not fill roles as a result of these promises. Another ROCU has a different approach to avoid this cliff-edge scenario, which is to use the previous year's budget for future periods and trust the reassurance given by the NPCC leads.

Ineffective funding structures also create inefficiencies in the response to SOC. One ROCU head said: "I spend four months of my year, every year, trying to convince police and crime commissioners to spend on the ROCU." Another described a "disproportionate" amount of time being spent on justifying their ROCU's value for money to different chief constables and PCCs. A more structured financial plan would provide stability and time for the ROCUs to focus on tackling SOC.

The ROCUs have existed for over ten years. We made a recommendation about funding in 2015 and five years on, there is still no sustainable model. This is a cause of concern.

Cause of concern

We found that the complexity and short-term nature of ROCU funding has a significant detrimental effect on how well they operate. We also found that local interests, rather than regional and national threat, risk and harm, affected prioritisation.

Feedback from across the ROCUs, from senior managers to frontline staff, consistently identified funding as their top concern. This was echoed when interviewing national leads.

Business leads find it difficult to plan, staff face uncertainty about the tenure of their posts, ROCUs struggle to attract and retain talent based on fixed-term arrangements and they can't invest effectively in specialist capabilities. This is neither effective nor efficient and is a cause of concern.

Recommendation 7

By February 2022, the Home Office should lead work with the NPCC and the APCC to identify a sustainable funding model for ROCUs that:

- provides long-term clarity and certainty to the funding position of the ROCUs, to allow for future business planning and more financial stability; and
- enables ROCUs to lead the response to SOC in their region.

Staffing

A major part of ROCU budgets is spent on staff. All the ROCUs we inspected highlighted staffing problems, most of them related to funding.

Short-term funding affects recruitment and retention and results in a continuous struggle to keep some essential posts filled. For example, more than half of one ROCU's disruption team left in the absence of confirmation that short-term funding

would be renewed. Staff had already moved on by the time extended funding was confirmed.

People are reluctant to apply for posts that depend on short-term funding. The wellbeing of staff in such posts is affected when they are not notified until very late whether their contract will be renewed.

In all ROCUs, there was evidence that rates of pay among police staff made it hard to attract and retain them. Some ROCUs are co-located with, or near to, NCA premises. The significant difference in pay leads to ROCU staff moving to the NCA. One ROCU senior manager told us: "Three members of ROCU business support staff recently joined the NCA and now earn £6,000 more working over the road."

ROCUs found it difficult to retain staff with specialist skills, particularly in cyber-crime, because policing salaries were not competitive with the private sector.

We found some evidence of good practice where a ROCU paid an enhanced salary to recruit and retain highly specialised staff members. A consistent approach needs to be implemented within government agencies to pay staff based on their skills.

Conclusion

In the SOC strategy, the Home Secretary described SOC as the most deadly national security threat faced by the UK and said it persistently eroded our economy and communities.

The SOC strategy highlights that the ROCUs should play a critical role in responding to this threat, as the interface between the NCA and local forces and by leading the regional response. In particular, ROCUs should target those who cause the most harm and conduct criminality that crosses force, regional and national boundaries.

In general, ROCU staff carry out their roles professionally and to a high standard. Their senior leaders work hard to balance the conflicting demands of national priorities with those of local interests. Each ROCU has developed specialist capabilities that support both forces and national agencies in targeting organised crime.

An example of that co-operation and collaboration is Operation Venetic, an extremely successful operation targeting OCGs across the country. But in most regions, ROCUs do not lead the regional response to organised crime. They are hampered by funding problems, the lack of a mandate to direct force resources, conflicted leadership and a complex governance structure, which means that they are ultimately answerable to many chief officers and PCCs.

The chronic and persistent problems with funding must not continue if the ROCU network is to be a successful part of the whole system response to tackling SOC. We have identified this as a cause of concern.

Despite the problems with funding and the need for greater co-ordination and collaboration, ROCUs have made substantial progress since our last inspection. The fact that each ROCU has most of the core capabilities is proof of this.

A stronger central co-ordination function is needed to strengthen ROCU leadership and provide greater collaboration, consistency and clarity of roles. More empowered national leadership for the ROCUs would create a more effective prioritisation process and ensure stronger partnerships with the NCA, police forces and external organisations.

We have made six recommendations and raised one cause of concern to improve the effectiveness of ROCUs in tackling SOC.

Appendix 1: Map of the ROCU network

Map provided by the National Operations Capability Office

The Regional Organised Crime Units and Constituent Forces

3 TITAN
- Cheshire
- Cumbria
- Greater Manchester
- Lancashire
- Merseyside
- North Wales

4 TARIAN
- Dyfed-Powys
- Gwent
- South Wales

5 ROCUWM
- Warwickshire
- West Mercia
- West Midlands
- Staffordshire

8 SWROCU
- Avon and Somerset
- Devon and Cornwall
- Dorset
- Gloucestershire
- Wiltshire

10 SEROCU
- Hampshire
- Surrey
- Sussex
- Thames Valley

1 NERSOU
- Cleveland
- Durham
- Northumbria

2 YHROCU
- Humberside
- North Yorkshire
- South Yorkshire
- West Yorkshire

6 EMSOU
- Derbyshire
- Leicestershire
- Lincolnshire
- Northamptonshire
- Nottinghamshire

7 ERSOU
- Bedfordshire
- Cambridgeshire
- Essex
- Hertfordshire
- Kent
- Norfolk
- Suffolk

9 LONDON*
- Metropolitan Police
- (City of London)
- (British Transport Police)