

## Chief Constables' Council

## Appendix A

# Aviation Programme – Service Optimisation, Funding & Finance, Governance & Delivery

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 Date created: 23<sup>th</sup> December 2019 v.10  
 Coordination Committee: Operations  
 Portfolio: Aviation  
 Attachments @ paragraph: Appendices A-P Page 35

### 1. TABLE OF CONTENTS

1 Index .....	Page 1
2 Glossary .....	Page 1
3 Purpose .....	Page 2
4 Executive Summary.....	Page 2
5 Aviation Strategy Stage 1 & 2 .....	Page 5
6 Evidence Base .....	Page 6
7 Design Principles .....	Page 10
8 Optimised Service .....	Page 12
9 Funding and Finance .....	Page 18
10 Governance & Delivery Model.....	Page 26
11 Summary .....	Page 32
12 Appendices .....	Page 35

### 2. GLOSSARY

**ACPO** – Association of Chief Police Officers  
**ACS** – Actioned Call for Service  
**AM** – Accountable Manager  
**AOC** – Air Operators Certificate  
**APACCE** – Association of Policing and Crime Chief Executives  
**APCC** – Association of Police & Crime Commissioners  
**BTP** – British Transport Police  
**BVLOS** – Beyond Visual Line of Sight (drone)  
**CAA** – Civil Aviation Authority  
**CT** – Counter Terrorism  
**EVLOS** – Extended Visual Line of Sight (drone)  
**HMICFRS** - Her Majesty's Inspectorate of Constabulary Fire and Rescue Services  
**IAG** –Independent Assurance Group  
**LGDB** - Local Governance and Delivery Board

**LSB** – Local Strategic Board (NPAS)  
**MCA** – Maritime & Coastguard Agency  
**NPCC** – National Police Chiefs' Council  
**NPAS** – National Police Air Service  
**NSB** – National Strategic Board (NPAS)  
**PAOC** – Police Air Operators Certificate  
**PAYG** –Pay As You Go  
**PCC** – Police & Crime Commissioner  
**RCB** – Regional Collaboration Board  
**ROB** – Regional Operations Board  
**RUG** – Regional User Group  
**S22A** – Section 22A of the Police Act 1996  
  
**VLOS** – Visual Line of Sight (drone)  
**WYP** – West Yorkshire Police

### 3. PURPOSE

The NPCC Aviation Strategy was agreed in July. This paper provides *strategic options* for Chief Constables in relation to:

- Optimised Service
- Funding and Finance
- Governance and Delivery Model

### 4. EXECUTIVE SUMMARY

The 10 year Police Aviation Strategy was agreed in July 2019 with the headline aim, 'To build a blended future national air support service that is affordable and available to deploy to the highest threat, harm, risk or vulnerability'. This programme has focused on how best to use air support assets and tactics to keep the public safer. The first phase of delivering this has been to produce *strategic options* for Chief Constables and PCCs to consider in relation to how best to optimise the operational service provided to forces; to choose the most appropriate governance structure and delivery model and to suggest ways in which the service can be funded.

The research conducted has involved interviews with Chief Officers and where possible OPCC colleagues from all forces in England and Wales. This has been combined with analysis of the current NPAS operation and has been reviewed by Cranfield Aeronautical University. Financial data has been checked by a police accountant and discussed at length with a member of the NPCC Finance Committee.

The report explicitly acknowledges the contribution made by the Chair of the NPAS National Strategic Board (NSB) and to West Yorkshire Police (WYP) who on behalf of the police service, have hosted this, the largest and most complex national collaboration, since its inception in 2012.

Research shows:

- Nearly all forces have a continuing operational need for air support and there is no appetite to return to individually owned and operated aircraft.
- Unlike other forms of collaboration, where national scale can be expected to deliver savings and efficiencies – the original business case that created NPAS did not take account of the uniqueness of aviation and the consequential increase of about £5M p.a. of unavoidable additional cost. *When NPAS was formed, the police service created in regulatory terms its own airline.* The resulting funding pressure has contributed to the net reduction in the number of aircraft, thus becoming ineffective as a response service in some parts of the country.
- It is now widely considered that the Lead Force delivery *model* is itself a sub-optimal way of managing collaborations and constraining to future ambitions.
- NPAS inherited a network of legacy bases, not all of which are aligned with areas of threat, harm and risk, leading to wasted flight time and high rates of cancellations.
- Current governance structures have evolved outside the scope of the collaboration agreement and are impeded by *ad hoc* participation by some forces; turnover of representation and lack of challenge from independent experts from the aviation industry.

The operational challenges facing NPAS:

- There has been a <sup>1</sup>sharp reduction in the number of tasks for air support. If this continues, it risks making the service non-viable in as little as 3 years. Despite this trend of falling tasks, flight hours have been stable and therefore productivity is in decline. Current funding does not support the

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<sup>1</sup> A contributory factor was a change in the deployment model to Threat, Harm and Risk in 2015.

level of flying being proposed, with the addition of up to 25% more hours through the introduction of aeroplanes. Due to performance restrictions that are attached to the aeroplanes, there is mismatch between where they can operate and where the demand for their services exists.

- The current funding model is a significant contributory factor in driving the reduction in tasks and has created, in some forces, an artificial market for the use of drones, where a conventional aviation asset would be cheaper or more effective to use, but currently attracts an Actioned Call for Service (ACS) charge.
- The sub-optimal location of some bases, is a key driver for a slow operational response and high rate of cancellation (c.40% overall).
- The fleet is ageing which reduces the amount of time individual aircraft are available to be used and increases the cost of maintenance.
- The development of line of sight drones across the country lacks consistency, but has revealed new demands for air support that can be fulfilled without the need for conventional aviation assets. It is accepted by forces that pursuits, wide area searches for vulnerable people or suspects and other dynamic incidents, cannot currently be effectively dealt with by drones.
- It is realistically foreseeable that Beyond Visual Line of Sight Drones (BVLOS) will be operationally viable within 3 years in rural and coastal areas. These will have the same capability as a conventional police aircraft.

### Options for Change

The service has a distinct choice to make regarding the future provision of air support. To either continue to optimise and invest in expanding and updating an ageing fleet, in order to be able to provide an effective service as a *standalone* police capability, or seek to follow an incremental path towards service being provided by a strategic partner. This could then be expanded towards forming an ambitious partnership with other related functions, including the Maritime and Coastguard Agency (MCA) to create an air support service on behalf of all emergency services (centrally funded).

Such an opportunity exists from 2023, with the re-tendering of the current Search and Rescue contract. The Police Service would need to express its interest by April 2020. The MCA contract operates from 10 bases with 22 helicopters and an annual budget in excess of £200M. It is possible that some air ambulance charities may also want to join such a service, meaning that the current number of sites from which an air support response service to policing could be delivered, would more than double.

This report makes the case for the latter, by recommending the service now prepares itself to join such a partnership and proposes the following route options:

- To stabilise operational delivery and cost, optimise base locations and tasks achieved from aviation assets. The first stage of this process would involve a change in the role of NPAS, towards becoming a simpler, streamlined organisation, acting as an internal supplier of specific aviation services. This would involve each region then specifying the level of service they require. In practical terms – this would involve determining hours of operation, total flight hours, aircraft type (subject to availability). It is envisaged that this could be funded by assigning direct costs for the service specified by each region, as opposed to continuing with the subsidy based approaches that are associated with funding models or formulas.
- NPAS would be the sole supplier to a region for its helicopter/aeroplane, maintenance, pilots, fuel and certification (Air Operator Certificate (AOC)). Regions would provide local management and Constables, as Tactical Flight Officers, trained to national standards and have responsibility for tasking their local asset(s), using it/them to achieve as many tasks as they can within the flight hours that they agree to purchase.
- Regions would then be charged for the *direct cost* of the service level that they request. Ideally this

should be stabilised over successive years to help with financial planning.

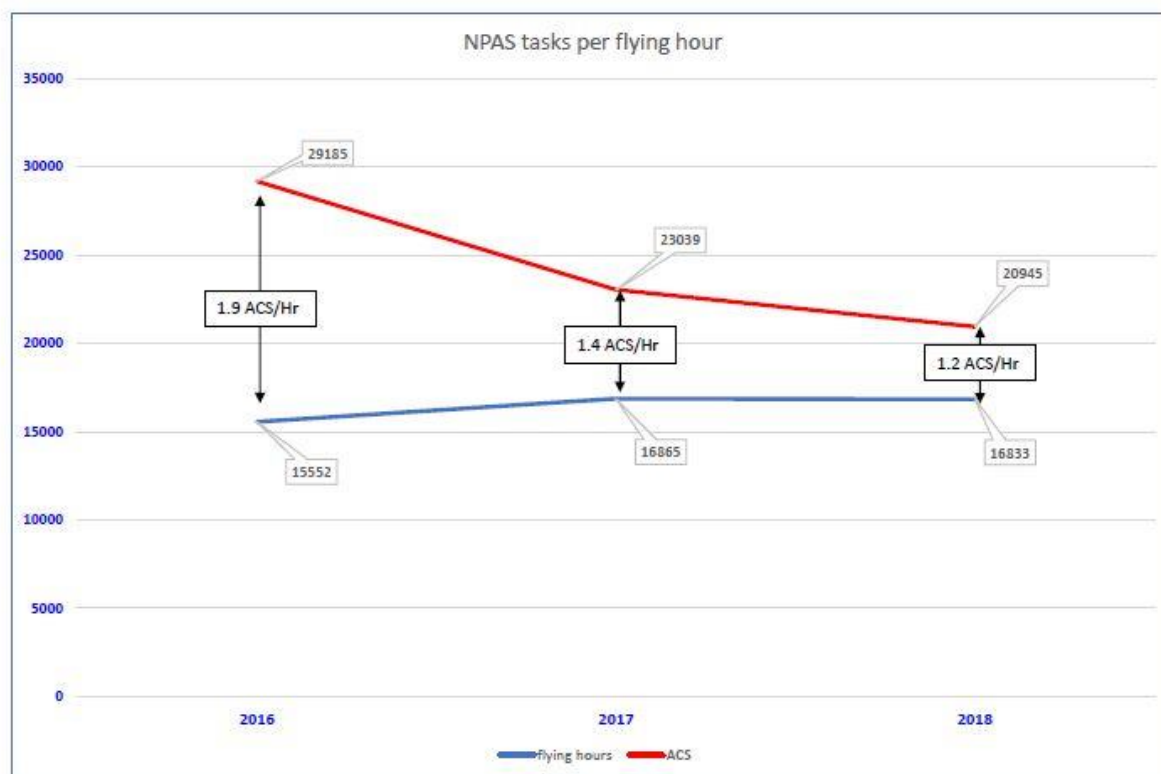
It is proposed that governance structures are aligned to accord with the outcome of the joint APCC/Home Office/Specialist Capabilities and NPCC work focused on how best to lead collaborated functions.

This being a 3 tier structure:

- Policing Board - chaired by the Home Secretary – includes NPCC, APCC and Home Office. Provides strategic overview of policing.
  - Aviation Management Board – chaired independently. Includes WYP PCC and NPCC Aviation lead. Includes drone governance. Leads delivery of the Aviation Strategy
  - Local Board/Service Provider Board – chaired by WYP – Focused on the operation of NPAS by WYP. Flexible to change of operator, or type of aviation service being delivered.
- It is proposed that Regional User Groups and the Independent Assurance Group would be replaced by existing Regional Collaboration Boards, where aviation would become an added area of business. Each regional would then have a Chief Officer and PCC representative at the Aviation Management Board. Local variation may apply where forces choose to use other regional meeting structures.
  - \*\*\*\*\*S31 & S24\*\*\*\*\*
    - No changes are proposed for: Birmingham, Redhill, Carr Gate, St Athan or Almondsbury.
  - Recommendations are shown at **Appendix A.**
  - It is intended by these changes to further reduce the number of hours flown by helicopters from 16,500 towards 13,500, with the gap being filled by the new aeroplanes. It is assumed that in the absence of the ACS funding model and the delivery of the 20k officer uplift – that the number of air support tasks will be no lower than they currently are.
  - The net effect of the reduced hours of base operation, together with increased use of aeroplanes in place of helicopters and the re-distribution of the existing rotary fleet, would provide opportunities to increase aircraft availability whilst the issue of fleet replacement is resolved.

#### *Next Steps*

It is proposed that the strategic options selected by Chiefs and PCCs are then subject to a focused 3 month period of detailed cost analysis by the NPCC Aviation Programme Team, working in partnership with WYP, Home Office, ACC and NPAS in order to produce a fully costed and risk assessed business case.



**Actionable Calls to Service (ACS) 2016-2018**

## 5. AVIATION STRATEGY – STAGE 1 & 2

The work commissioned by Chief Constables in July has been focused on producing optioned proposals that are intended to *stabilise* and *optimise* the current provision of air support services.

The evidence base amassed as part of this work includes:

- Interviews with **Chief Officers from every force in England & Wales, including BTP**, in order to understand the local context and requirement for present and future forms of air support. (Where possible OPCC representatives were also seen during these visits).
- An independent analysis of current air support service delivery, alongside the distribution of threat, harm and population within England & Wales.
- Benchmarking against aviation industry best practice and the sector specific strategic partner comparator provided to Police Scotland.
- The methodology and conclusions arising from this scrutiny have been independently reviewed by Cranfield Aeronautical University. Financial data has been checked by a police accountant and discussed at length with a member of the NPCC Finance Committee.

This report acknowledges with thanks the cooperation of NPAS, West Yorkshire Police and their PCC – who have for the last 7 years, carried the significant additional responsibility of operating a complex airline on behalf of policing in England and Wales.

This programme is cognisant of and has engaged with the following related pieces of national strategic work:

- The NPCC Specialist Capabilities Programme
- APCC/Home Office scoping of organisational models to host national capabilities. (Local Partnerships)
- Review of aviation use by Maritime & Coastguard Agency. (MCA)
- APCC review of Section 22 (Police Act) agreements

## 6. EVIDENCE BASE

### 6.1 Service Optimisation:

- In 2010 the police service operated 33 aircraft from 31 bases and flew 29,840hrs p.a. There is no reliable data on tasks completed at that time. An agreement was reached by the then ACPO Aviation Lead with forces, to retain their aircraft pending the commencement of NPAS - 2 years later. This included plans to reduce the size of the total fleet from 33 to 26 aircraft. By 2018 NPAS operated 19 aircraft and flew 16,833 hours p.a.
- Air support tasks have declined by 10,000 (36%) since 2016, whilst flying hours have remained stable. Although NPAS was commissioned based on delivering an equitable 20 minute response service to 98% of the population of England and Wales – it is now resourced to deliver an effective response service to a smaller area, focused mainly on the main conurbations. It is acknowledged the implementation of the Threat, Harm and Risk operating model has played a part in the reduction of tasks.
- Over 40% of NPAS Actioned Calls for Service (ACS) are cancelled before take-off, or prior to arrival. This equates to over 1,000 flying hours at a gross cost in excess of £1m. This occurs for a variety of reasons – but is largely due to long transit times where bases are in sub-optimal locations, or where the incident, for which the aircraft has been justifiably requested, is resolved prior to its arrival.
- \*\*\*\*\*S31 & S24\*\*\*\*\*
- \*\*\*\*\*S31 & S24\*\*\*\*\*
- \*\*\*\*\*S31 & S24\*\*\*\*\*
- The operational deployment model for the use of aeroplanes is developing. The type chosen has only a modest speed advantage over a helicopter and cannot deploy quickly from its base due to having to ground taxi (position itself for take-off) and complete more extensive pre-flight checks. At provisioned usage rates it is estimated that each aircraft will need to be offline in maintenance for one week in every four. The capability has benefits in terms of endurance and will be able to perform pre-planned tasks. Aeroplanes can also transit in more marginal weather conditions, although still needs to be in sight of the ground overhead the scene of incidents. Unfortunately, performance limitations imposed on the use of these aircraft mean that they can operate from only a limited number of airfields – which are not necessarily located in areas where there is a demand for their service.

#### 6.1.1 Feedback from Forces and Stakeholders – Service Requirement:

- Prompt attendance at incidents is desirable – usually within 15 minutes in larger urban areas. Forces are keen to see a higher proportion of incidents categorised as requiring a priority response.
- The relationship between NPAS bases and their local forces is perceived as having become too distant. Local priorities are not understood and NPAS staff have inconsistent access to monitor command and control systems and Airwave Talk groups in order to seek out opportunities to add value.
- A reliable service is wanted where forces are kept up to date with an estimated arrival time for an assigned air support asset in order to improve deployment decision making and reduce cancellation rates.
- Tactical air support advice is welcomed for the commanders of large events and significant incidents – including during the planning phase.
- A monthly performance report that shows outcomes and outputs from air support – linking conventional aviation with drones and showing value added against local priorities.
- For NPAS staff to add value during periods of aircraft maintenance or poor weather, by supporting local work with drones or joining local colleagues to enhance policing skills.

- Simpler tasking arrangements – avoiding the delays associated with a national control room that acts as intermediary between local forces and their respective base.

## 6.2 Funding & Finance

- NPAS has a forecast budget for 2020/21 of £44.8m revenue and £22m capital. The revenue budget has a significant proportion of fixed costs estimated at approximately 75%.
- NPAS has received £98m of capital in the form of Home Office Grants since 2012/13.
- The National Police Air Service (NPAS) was formed incrementally between 2012 and 2016 with the intention of delivering a borderless operation, with economies of scale for forces across England and Wales. At its inception, there were 31 bases operating a mix of 33 aircraft (predominantly helicopters with a few aeroplanes), flying a total of 29,840 hours at a combined revenue and capital cost of around £63.5m p.a. The gross cost of a flying hour pre NPAS can therefore be calculated as £2,128 per hour based upon total cost of £63.5m divided by total flying hours at 29,840 p.a.
- In 2019, the NPAS revenue budget £42.563m with a capital budget of £10.485m (after deducting capital credits to forces) meaning the annual cost of NPAS flying is £53.048m. The helicopter fleet has reduced to 19 aircraft, at 13 bases and flying 16,500 hours annually. The gross cost of a flying hour can therefore be calculated as £3,215 which represents a significant increase when compared with 2012. NPAS has also procured four aeroplanes which are awaiting full commissioning and will incrementally enter service from December 2019. These will further increase flying hours capacity and revenue cost. NPAS has estimated the current revenue budget will increase by 4% in 2020/21 to £44.8m).
- Running a national air support service adds an estimated £5m per annum of additional cost that is attributed to the administrative operation of what is now in regulatory terms, an airline; the command and control of the fleet and the financial risk-based shortcomings of the lead force delivery model. This additional cost was not identified upon the creation of NPAS and resulted in a structural deficit in the NPAS revenue budget which was recognised and paid for on a one-off basis by the Home Office in 2013/14. The desire of the NSB to avoid significant budget increases in subsequent years has created an additional pressure to reduce the number of aviation assets available for use. It is a significant causal factor in the service becoming ineffective in some areas of the country, in that the removal of additional helicopters from service and closure or merging of bases has stretched the remaining service provision beyond operational effectiveness in areas.
- Over the last 4 years:
  - Cost to forces has increased by just 6.4%. (Apr 2016 - Mar 2020) A further 4% increase is planned for 2020/21.
  - The number of ACS has decreased by 35.6%
  - The cost of every ACS has increased by 66.7%
  - The flying hours used by NPAS have remained at a fairly consistent level near to 16,500 p.a.
- In 2019 the gross cost of operation per flying hour is £3,215, excluding the capital paid back to forces each year in lieu of their previous helicopter ownership<sup>2</sup>. This compares with £3,560 per hour for an outsourced service where no helicopter purchase is required.
- The estimated capital cost of the fleet replacement programme for just 5 new helicopters is £38m which is likely to be spread over 3 financial years. When considering the cost of this investment amortised over 10 years it amounts to £3.8m annually or an additional £230 per flying hour. This additional capital cost would need to be considered when calculating the gross hourly cost in years to come, especially given that at least 10 helicopters are currently in need of replacement. In reality – a minimum of 10 new helicopters are required now –to deal appropriately with the ageing fleet.

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<sup>2</sup> Capital credits have been paid to forces since the inception of NPAS, in 2019/20 they amounted to £2,468,661.

- The trend of the reducing numbers of tasks, with stable flying hours infers that, in common with other areas of policing, there is not yet a culture of commercial expedience expected from operational air crew.
- \*\*\*\*\*S31 & S24\*\*\*\*\*
- There is currently no means to migrate funding from conventional aviation to drone technology or for the current delivery model to cope with the continuing decline in tasking, as drone use increases.

#### 6.2.1 Feedback from Forces

Stakeholders are asking for:

- A more reliable and timely service before they will consider spending more on air support.
- A say in the type of service that they commission from NPAS in terms of hours and tasks.
- A funding formula that provides a multi-year settlement.
- A funding formula that promotes increased productivity from air support.
- Flexibility to incrementally invest in drone capability and capacity.
- Forces do not want a subsidy based model where they are paying for another force's service.

### 6.3 **Governance & Delivery Model**

- On 28<sup>th</sup> June 2012 the Secretary of State made an order under Section 22A (S22A) of the Police Act 1996 mandating police air support as a police function that must be delivered through a *single national* collaboration. The mandate does not specify how this should be achieved.
- Section 22A (S22A) of the Police Act 1996 collaboration agreement set out how collaboration would be achieved and its governance. The original S22A did not define a legal framework within which to operate NPAS other than the role of the lead force Police & Crime Commissioner (PCC).
- Only after consultation with the NPAS National Strategic Board (NSB) or by order of Secretary of State can the agreement be varied.
- Should the lead force wish to pull out of the agreement, it has to be ratified by the NSB, giving a 12 month notice period.
- Under the current S22A individual forces cannot leave NPAS unless 75% of policing bodies agree and a 12 month notice period is given. Although referred to here in the singular, there are a number of S22As pertaining to singular forces or collective of forces, as and when they made the transition to NPAS. The last (Humberside) joined on 27<sup>th</sup> September 2016.
- Work on the revised S22A, which would have consolidated all of the single force agreements, has been on hold since 2017 which coincided with the publication of the HMICFRS report, 'Planes, Drones and Helicopters'. See **Appendix B**
- It was agreed by all PCCs and Chief Constables (CCs) that NPAS would be delivered as a lead force model by the PCC for West Yorkshire and that the CC of WYP would be responsible for the operational delivery. All parties to the agreement would share financial liabilities.
- The lead force CC holds the Police Air Operator Certificate (PAOC). The Chief Superintendent (Chief Operating Officer), who leads NPAS on a daily basis, undertakes the aviation regulatory role of Accountable Manager (AM) and reports to the Lead CC. The AM has legal responsibility and is accountable to the Civil Aviation Authority (CAA) for managing operational risk and ensuring safe operation of the service.
- The PAOC holder and the AM are the highest policing roles recognised under CAA legislation. The CAA legislation does not recognise the PCC role.



- The original S22A did not define the roles and responsibilities of either the NPAS Local Strategic Board (LSB) or the Independent Assurance Group (IAG).
- The NSB sets the strategic direction for NPAS and requires the CC (WYP) to account for the operational delivery of the service. The LSB supports the NSB and manages the operational and financial performance of NPAS. The IAG represents the operational users of air support and monitors NPAS' delivery for consideration of the NSB.
- The Police and Crime Commissioner (PCC) of WYP is the legal entity for NPAS for the purposes of governance, including contractual arrangements, ownership and management of assets, audit, assurance and public accountability. The Lead PCC holds the view that because he is the legal entity and carries the associated risks, it is also necessary for him to be the Chair of both the NPAS NSB and LSB.
- The obvious benefits of the presiding Chair have been the stability, knowledge and understanding of the opportunities and challenges since commencement of the collaboration. However the lead force model places potential for conflicts of interest on the PCC, as there is no clear delineation between the two roles.
- The HMICFRS report highlighted that responsibility for the governance of police air support is primarily divided between the National Police Chiefs' Council (NPCC) lead for Aviation, the NSB, the NPAS lead CC and lead local policing body.
- The Inspectorate made a recommendation that, 'a local policing body member of the Board, other than the lead local policing body, should be appointed as Chair of the Board.' This was formally tabled at NSB but the decision was taken to retain the *status quo*.
- The National Aviation Programme Team made a decision not to explore the internal management structures of NPAS as it was deemed to be out of the scope of this programme.

#### 6.3.1 Feedback from Forces & Stakeholders

- There was strong support amongst forces for the continued availability of conventional air support.
- Perception that current board membership lacks broad regional representation. The view was expressed that some Chief Constables and PCCs feel they have not been able to influence services and consequential cost. (The recommendation to align the five NPAS regions with the nine NPCC regions should mitigate this).
- The NSB is perceived by some to endorse and ratify decisions, as opposed to being the strategic decision-making body that leads, sets direction for NPAS and holds it to account for delivery. Some of the current board membership challenge this perception.
- Attendance and appropriate representation from forces, particularly at the Regional User Groups (RUG) is often poor and inconsistent.
- The only opportunity for most police services to influence the direction of NPAS is through attendance at the RUGs – this follows the previous point about the NPAS regions, however attendance and proper representation at the respective Boards is often poor and inconsistent.
- Although the NSB is advised by NPAS officials with significant aviation expertise (as well as some members of the Board), the Board lacks broader independent industry experience that would bring further professional challenge and scrutiny.
- All forces recognise the advances in conventional aviation capability and drones, but do not have the expertise to help inform the Board's future vision or to set strategy.

- There is a desire to revise the S22A agreement. Despite efforts to do so, there is yet to be a consolidated and ratified S22A due to the emergence of this programme and other work.
- There is an insufficient understanding of the demand of air support and future operational requirement, both internally and externally. There is a lack of clarity of customer/force requirement. (This is despite the NPCC review and HMICFRS report putting these issues to policing in 2017).
- With one exception, no forces are seeking the local return of management of their own air asset.
- Some chief officers do not feel sufficiently informed about how air support budgetary decisions are made. Currently only PCCs on the NSB can vote on the budget; the NPCC would like this extended to CCs. This request was formally posed to the NSB in December but deferred until after the outcome of this paper.
- Some forces have a desire for the NSB to be responsible for the strategic governance of drones.

## **7. DESIGN PRINCIPLES**

### **7.1 Service Optimisation is defined as.....**

- Bases located to provide areas highlighted as a priority by forces with a response time that meets local standards, minimises cancellations and reduces unproductive flight time.
- Simple tasking processes that deliver quicker deployments.
- Freedom for air support assets to complete secondary tasks without incurring additional costs.
- BVLOS development is accelerated and owned by nationally.
- The uniqueness of the scale and complexity of London in terms of congested airspace, obstacles and navigation requirement calls for continuity and consistency of experience.

### **7.2 Funding & Finance**

**To create a funding model that promotes optimal decision making in relation to air support by:**

- Making the best use of a scarce resource
- Supporting the efficient and effective determination of the most appropriate air asset to fulfil an individual operational need.
- Optimising the effective deployment of air support in accordance with threat, harm, risk and vulnerability.
- Ensuring that the fixed costs of providing the service are fully covered.
- Ensuring costs charged are reflective of what the service actually costs to deliver.
- Ensuring there is no financial risk carried by the lead force.

**Implement the funding model in a way that:**

- Gives forces the opportunity to influence the capacity and cost of the services that they receive.
- Bring greater predictability, stability and financial efficiency by enabling charging across multiple financial years.
- Promote fairness to all parties but accept the costs of a national service.

- Is simple to understand and flexible enough to be modified in future as technology impacts upon demand.
- Encourages the delivery of efficiencies and continuous improvement.
- Encourages the maximisation of every minute flown for the benefit of policing.
- Is non-discriminatory and acknowledges differing response levels and hours of operation.
- Ensures that no force is subsidising the service provided to another.
- Makes it possible to move funding from one area of air support to another for example from between helicopters, aeroplanes and various levels of drone operation.

### **7.3 Governance & Delivery Model**

- Build a more integrated and collegiate approach to collaboration by broadening the influence of APCC and NPCC members to the strategic financial leadership and service delivery of police aviation.
- Governance structures that are flexible and adaptive to changes in service provider and can be responsive to the shifting balance from conventional aviation to drone use.
- Ensure that key governance boards have access to senior leaders and practitioners from the aviation industry to offer operational and commercial perspectives from outside of policing.
- Utilise an independent chair for the highest level of governance board to bring greater challenge to those that deliver all forms of aviation service operationally.
- Service aims should incorporate safe operation, effective response to threat, risk and harm, value for money, sustainable economic and environmental outcomes; a robust risk management and performance framework.
- The chosen governance model needs to ensure it has the appropriate representation and decision-making responsibilities at every level.
- Each force must take on responsibility for ensuring proper and appropriate representation at the relevant future governance boards.
- NPCC would like voting rights on the budget extended to CCs on the current NSB.
- Any future design needs to be cognisant of current work being undertaken by the Specialist Capabilities Programme and should align to the developing national S22A agreements being led by the APCC.
- Emerging and advancing technology, including BVLOS drones must be considered in any future design options.
- Future governance arrangements should be adaptable to accommodate collaborative working opportunities, for example with the MCA.
- The relationship between NPAS and forces is ambiguous and ranges from collaborative stakeholder to customer/supplier.

## **8. OPTIMISED SERVICE**

### **8.1 Tasking & Deployment**

#### **8.1.2 Current Delivery Model**

Tasks are referred by forces to the NPAS Operations Centre in Wakefield. Once graded – they are then communicated to local bases. Staff at these bases have limited means of monitoring local incidents to identify early opportunities for them to add value, or to provide aviation tactical advice to local commanders.

### 8.1.3 Feedback from Forces

There were mixed views from forces regarding the benefits of the NPAS Operations Centre. This facility costs c. £1.5M p.a. in staffing costs alone. Some groups of forces have asked that tasking be returned to them on a regional basis. Others see this as a retrograde step that would lead to a lack of equitability in service provision, favouring ‘those who shout loudest.’

### 8.1.4 Analysis

The current model is additive in terms of response time, where calls effectively pass via the national centre, rather than directly to a local base from the requesting force. The grading system used by NPAS does not explicitly take account of local priorities and an average of 9% are assigned a priority grading, which does not meet the expectations of most forces. There is also evidence that some forces task helicopters too quickly – without considering viable operational alternatives that avoid an NPAS deployment, thus preserving flying hours and controlling costs.

### 8.1.4 Models Considered

- Enhance current national tasking model
- Promote regional tasking model
- Outsource to a strategic partner
- (Return to single force air support) – *not supported by forces, so not considered further*

## 8.2 **Recommendations**

1. Trial the concept of regional tasking in the East Midlands, the North West and London. This would involve a lead force being identified in each region that would task their respective air support asset. This could be further enhanced by bases becoming more engaged with their local forces through monitoring incidents, looking for opportunities where air support could deliver outcomes. A change of funding formula away from ACS to a system based on flight hours will also unlock new potential for secondary tasking and a significant increase in tasks/outcomes, without being cost additive.
2. NPAS to ensure that predicted arrival times are provided to forces at the point at which the air asset is tasked in order to inform local decision making and to reduce the number of cancelled flights.

Local tasking existed prior to the inception of NPAS. Although it passes work to forces, it is spread across control room operators and as such is unlikely to require additional staff/cost. Protocols will need to be established in order to facilitate borderless operations and maintain the integrity of a national service. A regional control centre will also need to offer a simple ‘flight follow’ radio service to check on the welfare of the crew when airborne and for take-off and landing.

## 8.3 **Helicopter Basing**

### 8.3.1 Current Delivery Model

\*\*\*\*\*S31 & S24\*\*\*\*\*

### 8.3.2 Feedback from Forces

A response service to priority areas within Norfolk, Suffolk, Lincolnshire, Cumbria, Humberside, Dyfed Powys, the majority of Cornwall and parts of Lancashire takes over 30 minutes and does not meet the local operational need.

Long response times lead to high cancellation rates and wasted flight time.

### 8.3.3 Analysis

Demand analysis and force feedback indicates that the following bases could be operated less than 24/7 – with some having the potential to be reduced to 12/7. (Paired regionally with a 24/7 base). Newcastle, Hawarden, St Athan, Exeter, Benson, Bournemouth, Redhill, Husbands Bosworth.

## 8.4 Recommendations

All bases locations optimised by mapping ‘real life’ response arcs against desired attendance times and priority locations set by forces and aligned with threat, harm and risk.

1.	*****S31 & S24*****
2.	*****S31 & S24*****
3.	*****S31 & S24*****
4.	*****S31 & S24*****
5.	*****S31 & S24*****

6.	*****S31 & S24*****
7.	*****S31 & S24*****
8.	*****S31 & S24*****
9.	*****S31 & S24*****
10.	*****S31 & S24*****

### 8.4.1 Risks, Interdependencies and Implementation

A detailed implementation plan is required to confirm the indicative cost benefits attributed to each of these change options. An indicative operational performance forecast is shown at **Appendix C**.

## 8.5 Understanding London

### 8.5.1 Current Delivery Model

London receives an uninterrupted service primarily from bases at North Weald near Stansted, Redhill near Gatwick and RAF Benson in Oxfordshire. Tasking is managed through NPAS’s national Operations Centre.

### 8.5.2 Feedback from Force

It is perceived by MPS commanders that crews who are not trained and regularly operating within London – are less likely to be effective at providing an air support service to the capital.

### 8.5.3 Models Considered

- \*\*\*\*\*S31 & S24\*\*\*\*\*
- \*\*\*\*\*S31 & S24\*\*\*\*\*
- \*\*\*\*\*S31 & S24\*\*\*\*\*

### 8.6 **Recommendations**

10. \*\*\*\*\*S31 & S24\*\*\*\*\*
11. \*\*\*\*\*S31 & S24\*\*\*\*\*

## 8.7 **Promoting & Supporting Drones**

### 8.7.1 Current Delivery Model

\*\*\*\*\*S31 & S24\*\*\*\*\*

### 8.7.2 Feedback from Forces

\*\*\*\*\*S31 & S24\*\*\*\*\*

### 8.7.3 Independent Analysis

\*\*\*\*\*S31 & S24\*\*\*\*\*

### 8.7.4 Models Considered (Appendix D)

- No change
- Deliver all aspects of drones nationally
- Hybrid – national governance of procurement, training and operational standards, with local deployment.

## 8.8 **Recommendations**

12. Create a capacity within NPAS/National Aviation to provide national leadership of drone procurement, training and operational standards.
13. Create a national capacity to support forces to deliver safe drone practices.
14. Mandate the adoption by all forces of the National Operations Manual.
15. Integrate drone tactics into broader guidance material in support of APP.

16. \*\*\*\*\*S31 & S24\*\*\*\*\*

17. Tactical deployment of visual line of sight drones should be funded, managed and led by local forces.
18. Minimise the risk of collision between drones and conventional aviation assets by adopting the learning from the North West De-Confliction Project.

#### 8.8.1 Risks, Interdependencies and Implementation

- \*\*\*\*\*S31 & S24\*\*\*\*\*
- \*\*\*\*\*S31 & S24\*\*\*\*\*

\*\*\*\*\*S31 & S24\*\*\*\*\*

### 8.9 **Aeroplane Deployment**

#### 8.9.1 Current Delivery Model

Four Vulcanair P68 aeroplanes were delivered in early 2019 at a cost of £12.5M\* and are due to become fully operational during 2020. A purpose built base was also established for these aircraft at Doncaster airport at a cost of @£5M.

#### 8.9.2 Feedback from Forces

Given that these aircraft are not primarily intended for urgent deployments, unless already airborne, a number of forces have expressed the view that there is no operational requirement for this capability and that they do not wish to pay for their services.

#### 8.9.3 Independent Analysis

The primary benefits of these aircraft are the cost to operate, flight endurance and ability to transit in poorer weather. At NPAS projected usage rates, this type of aeroplane will require an average one week of maintenance each month. These aircraft are only marginally faster in flight than a helicopter and so are not capable of making quick transit between regions. Recent performance restrictions placed on these aircraft will limit the airfields that they can operate from.

#### 8.9.4 Models Considered

- \*\*\*\*\*S31 & S24\*\*\*\*\*
- \*\*\*\*\*S31 & S24\*\*\*\*\*
- \*\*\*\*\*S31 & S24\*\*\*\*\*

#### 8.9.5 Option (For predicted performance see Appendix C)

1. \*\*\*\*\*S31 & S24\*\*\*\*\*
2. Optimise the use of MCA tasking of Search and Rescue (SAR) aircraft where their criteria is met.

## 8.10 Recommendation

9. Deploy 2 aeroplanes to Bournemouth. Retain 2 at Doncaster for services to the NorthEast, Lincolnshire and Norfolk.

### 8.10.1 Risks, Interdependencies and Implementation

- The revenue budget allocation and business case for these assets is still unclear.
- Force tasking of aviation assets is reducing – but flight hours has remained stable, making net productivity poorer. The addition of the additional 4300 flying hours (25%) projected by NPAS, will further exacerbate this. The revenue budget for these assets is still unclear. It is proposed here, instead, that helicopter flight hours should be reduced and replaced with aeroplane utilisation.

## 8.11 Air Support Performance

### 8.11.1 Current Delivery Model

Forces receive a monthly performance report that has recently been revised and includes quantitative and limited qualitative information across a range of headings that relate to aircraft availability, tasking and response times. Performance Delivery is also a standing item at the NPAS Independent Assurance Group (IAG) that comprises regional representatives from across operational policing at Assistant Chief Constable level. The performance report has developed out of the original service offer that underpinned the S22 collaborative agreement that formed NPAS and hence has been focussed on being a test of contract compliance, rather than enabling forces to gauge the value added by air support. It also does not include any links to local force drone performance.

### 8.11.2 Feedback from Forces

The new report format has been welcomed. Almost all forces commented that they would like more information about the qualitative benefits that air support has delivered – preferably linked to the achievement of local priorities and objectives to assist them to assess the value.

### 8.11.3 Independent Analysis

In those areas where response time is poor, or availability is insufficient, cancellations are high and wasted flight time is incurred. Only a small proportion of flights are graded as requiring a priority attendance time. The majority of forces want this to be the standard of service assigned to more incidents.

### 8.11.4 Models Considered

- Continued use of monthly reporting.
- Use of real time information sharing technology to allow forces to access and analyse data in order to be more intrusive in relation to the effectiveness of their own requests and NPAS performance.

## 8.12 Recommendations

20. Force command, control and tasking processes should be designed to identify and utilise the right aviation asset for the right task as part of delivering a blended service – both in a pre-planned and spontaneous context.
21. \*\*\*\*\*S31 & S24\*\*\*\*\*
22. Explore the use of web-based systems that allow forces to analyse real-time air support service delivery performance.
23. Provide forces with regular qualitative feedback on delivery – especially against local priorities/police and crime plans.



### 8.12.1 Risks, Interdependencies and Implementation

- Forces have a key role and responsibility to work with NPAS to reduce cancelled requests for service.
- Timely performance data that forces can access themselves gives local managers options to enhance the working relationship with their local base in order to maximise outcomes.

## 9. FUNDING & FINANCE

### 9.1 Delivery Models

#### 9.1.1 Current Delivery Model

The S22A collaboration agreement for the provision of police air support allows the NPAS National Strategic Board (NSB) to determine funding arrangements for NPAS. Forces are then charged for revenue funding via invoice issued by West Yorkshire Police on behalf of NPAS as the lead force. At the point of creating NPAS, a funding model was adopted based largely upon delivery of flying hours and a principle that every force would save money at the point of entry. All forces that had access to air support, with the exception of the Metropolitan Police Service, entered NPAS with an initial revenue cost of less than they were paying for their local collaboration or force owned aircraft.

#### Actioned Calls for Service

In the 2016/17 financial year a funding model based upon Actioned Calls for Service (ACS) was implemented. This involved charging for NPAS based on the previous years' use of the service. A call for service is considered actioned when an NPAS aircraft arrives at the scene of a task. This means that if they are cancelled prior to arrival, any flying time used and its associated costs are spread across all 43 Home Office forces and British transport Police. It is estimated that cancellations account for at least 1,000 wasted flying hours annually at a cost well in excess of £1m based upon a direct operating cost of at least £1,000 per flying hour.

Over the last 4 years the NPAS budget has increased as illustrated in the table below and the NPAS MTFF shows a predicted revenue budget for 2020/21 of £44.8m, an increase of £1.8m (4%). At the same time as this cost increase, there has been a corresponding decrease in requests for service as forces seek to control costs by managing downwards their air support needs. The impact of this reduced utilisation of available air support capacity, is an increase in the cost per unit of service (ACS) to every force.

Financial year	Revenue Budget	Change %	ACS <sup>3</sup>	Change %	Cost per ACS	Change %
2016/17	£39,990,569	-	29,185	-	£1,370	-
2017/18	£38,724,000	↓3 %	23,039	↓21%	£1,681	↑23%
2018/19	£40,472,000	↑5%	20,945	↓9%	£1,932	↑15%
2019/20	£42,562,750 <sup>4</sup>	↑6%	18,793 <sup>5</sup>	↓10%	£2,285	↑18%
2020/21	£44,758,459 <sup>6</sup>	↑4%	17,000 <sup>7</sup>	↓10%	£2,635	↑15%

Consultation with forces has shown that the current funding model is unpopular, especially with high-volume users and the Programme Team have received strong representations for change. Under the ACS model every air support task, no matter how simple to achieve is charged to forces at the same rate. This means

<sup>3</sup> flying hours and ACS are calculated on a calendar year basis 2016, 2017 & 2018 figures have been used

<sup>4</sup> Cost of NPAS for 2019/20 taken from total force contributions 2019/20 figure

<sup>5</sup> Predicted ACS as per NPAS Management Report Oct 2019

<sup>6</sup> Predicted budget for 2020/21 from MTFF not ratified by the national board at time of writing

<sup>7</sup> Assuming 2020 levels of ACS continue to reduce at a rate of 10% annually

that a task taking 5 minutes of flying time to complete and perhaps attached to another task is charged at the same rate as a task that takes 45 minutes to complete with a transit to and from it of some 30 minutes each way. This individual task cost has removed from air support a significant proportion of the value-added tasking that air support could routinely deliver to forces in the form of additional tasks undertaken when in a specific locality or area. A concern was raised by HMICFRS that there was a significant latent demand for air support and conversations with forces has confirmed this. This model also allows for forces to request a service and cancel it at any point prior to arrival and incur no cost.

The reduction in air support service demand can be attributed to a mix of poor service availability (slow response, lack of aircraft and crew availability), demand suppression by forces to cut costs and the use of alternative air support methods such as drones. The evidence shows that in the four-year period between 2016 and 2020 the cost to deliver air support has increased beyond anticipated levels, in part due to the unpredictable nature of aviation inflation rates – however the output/productivity of air support has decreased over the same period. This trend has seen the service reach a point whereby it will soon become unsustainable without significant change.

Over the last 4 years up to 2019/20:

- NPAS revenue cost will have increased by 6.4% with a further 4% increase for next year
- NPAS output (ACS) has decreased by 36%
- The cost of every ACS has increased by 67%
- The flying hours used by NPAS have remained at a fairly consistent level near to 16,500

See graph at Fig 1 (Page 21)

#### 10.1.2 Feedback from Forces

Forces value the contribution that air support brings to policing with many adding to their air support capability through the use of drones. The consensus of opinion is that drones are not a direct replacement for conventional air support and almost all forces see a continuation of the use of helicopters to deliver air support services in future. The introduction of the aeroplane fleet has received a mixed response with many forces stating that they see no use for the aeroplanes to support their policing objectives. This position is perhaps understandable as the capability is yet to enter active service and as such is unproven.

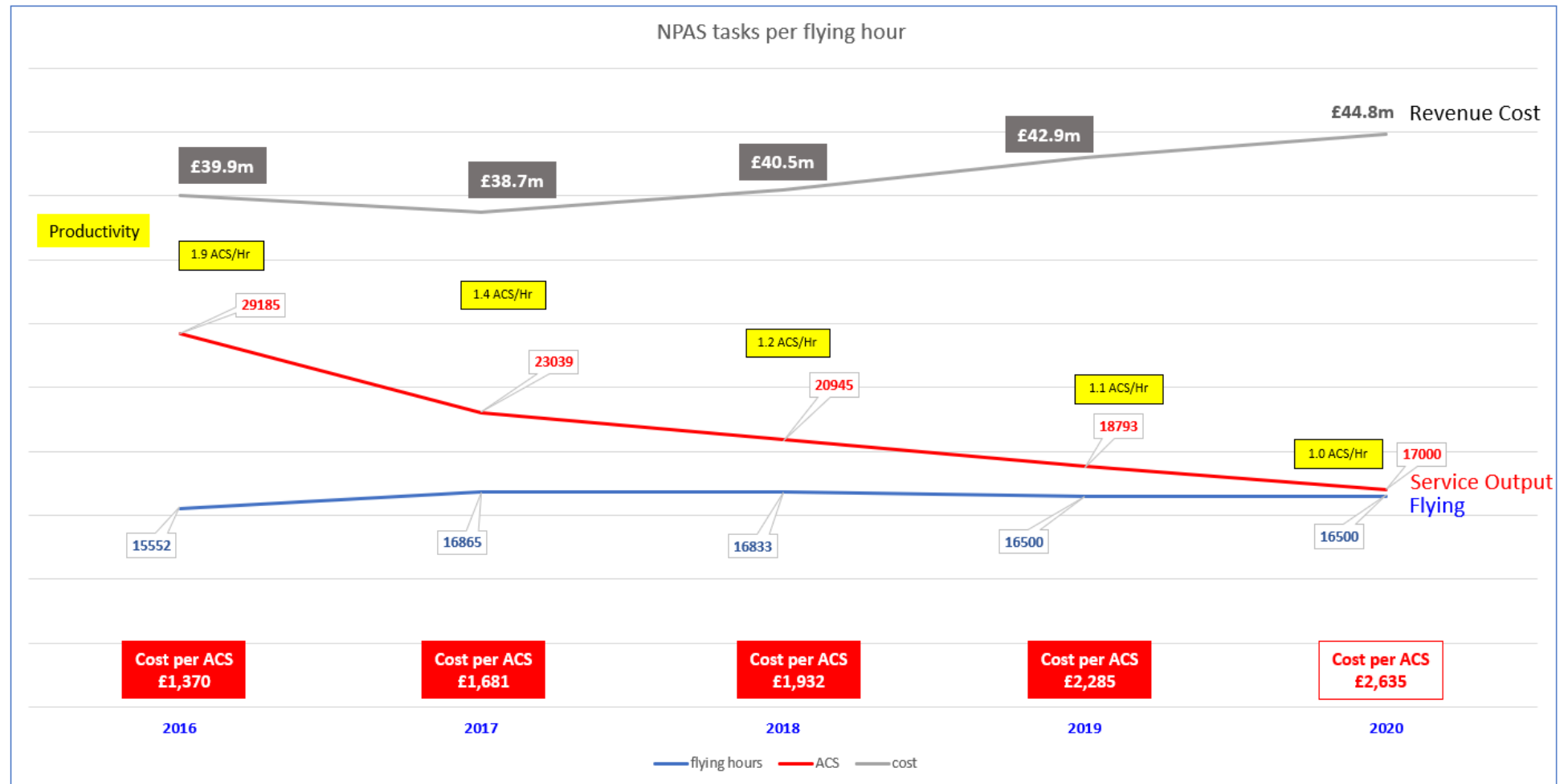
Forces believe that air support is expensive and no longer represents value for money. The increasing costs and declining service output supports this view. Forces are supportive of a restructured air support capability with a funding model based upon actual service cost and without a subsidy element. In common with the principles of local funding for policing, forces do not want to spend money subsidising the service in other areas. Forces expressed a desire to work collaboratively with regional partners and support a transparent and stable funding model based upon actual cost of service within which they can maximise their operational use of air support as appropriate.

Forces expressed a desire for predictability in relation to air support costs and it was suggested that a 3 or ideally 4 year forward looking settlement be agreed. If this could be timed to coincide with PCC tenure of 4 years then this has additional support and benefits to forces for planning purposes.

Forces understand that aviation can be expensive and that a significant proportion of air support costs are fixed and as such must be funded at the point of delivery by West Yorkshire Police. A two-part tariff, is outlined by the Specialist Capabilities Programme, whereby fixed costs and a proportion of variable costs are covered by a subscription charge with insurance elements and then the remainder of the variable costs covered by a pay as you go component. This model was described to forces and received positive support, however, it is still a net *subsidy model*. Forces stated that they liked the transparency that such a funding model provides however, they do not wish to subsidise the costs of service provided outside of their force area, or for assets that will deliver no benefits to their respective force area. There is a real desire amongst forces to pay the actual cost of the air support service they receive and no more.

**Fig 1 – NPAS cost, ACS and flying hours 2016-2020 (2020 ACS predictions assumes a continued annual reduction in ACS at 10%)**

\* 2019 & 2020 flying hours and ACS are full year estimates from NPAS data.



## 9.2 Understanding the NPAS budget (Appendix M)

The NPAS forecast revenue budget for 2020/21 of £44.8m has been examined in detail and the following general conclusions can be drawn:

- £17.9m is spent directly upon the maintenance and parts required to deliver flying hours, insurance and other direct operating costs.
- £21.9m is spent on personnel costs (WYP employed staff, seconded and commissioned services)
- £5m is spent on other costs and commissioned services fees

### 9.2.1 Fixed and variable costs

The specialist capabilities programme looked at the NPAS budget in 2018 and concluded that the fixed budget could be considered to be as high as 85%. Further analysis has concluded that at least 71% of the revenue budget is fixed and this is increased to 82% if the engine maintenance contract (PBH) is included.

### 9.2.2 Cost increases 2020/21

The cost increases predicted in 2020/21 relate primarily to the new maintenance contract that came into effect half way through 2019/20 and is now charged at full year costs. Additional HR related expenditure on pilot pay uplift, pension and salary increases have been determined by aviation market forces.

### 9.2.3 Costs of running a national air support service

Analysis has shown that whilst there were undoubtedly some efficiencies to be gained through national collaboration for air support in areas such as fuel procurement, insurance, maintenance and aircraft equipment procurement, the move overall was cost additive. The regulation of small local air support units under Civil Aviation Publication (CAP612) and a Police Air Operator Certificate (PAOC) was considered 'simple' by the CAA as regulator, but it is unlikely the Authority would allow return to that system. The creation of a national police air service however, created a small airline which is considered 'complex' by the CAA and as such requires a significant uplift in regulatory oversight and required staff with aviation experience. NPAS operates under a full (Police) Air Operator Certificate (PAOC) and as such is treated no differently to any other airline operating in the UK airspace.

Analysis has shown that the additional cost of running a national service is in the region of £5m annually and this can be explained as follows:

- The requirement for mandatory posts to satisfy the AOC, these posts are known as CAA Form4 Holders and cover critical functions of ground operations, flight operations, continuing airworthiness management, compliance monitoring, safety management & crew training as well as an accountable manager. The continuing airworthiness function that is now required for all maintenance activities would have been required under the old structure however, the costs of achieving this for NPAS are not high.
- The headquarters functions such as HR, IT, legal, procurement, finance, Q & A, health & safety and performance must now be paid for in full. The air support set up pre-NPAS involved a very small percentage of all of these functions which were provided from within force resources. The move to NPAS did not reveal savings in these areas. When aggregated on a national scale – this became a significant financial undertaking that is recoverable by WYP.
- The air support units pre-NPAS were despatched and controlled by local force control rooms as part of business as usual. This function for the whole country was transferred to West Yorkshire Police and has added a significant additional cost.

The collaboration for air support is mandated through a statutory instrument and as such the 43 forces in England and Wales are not able to obtain this service by any other means. This requirement to have a national air support provision and the added costs that this brings is presently being funded by forces.

The Home Office were approached with a proposal for an annual revenue grant to cover the costs of a delivering a national air support service. This grant of up to £5m annually would cover these additional costs and enable forces to be charged for the service provision locally rather than covering the national costs.

Capital Expenditure – in 2012 a decision was taken to provide the capital required by NPAS through a direct capital grant from the Home Office. This is ‘top sliced’ at from the police capital grant nationally. The rationale for the capital provision was the replacement of the air support fleet and role equipment, a function previously funded by local forces with a Home Office grant contribution of 40%.

The capital grant allocated to NPAS in the 8 years between 2012/13 and 2019/20 has been £98m.

NPAS have procured four aeroplanes during the last 8 years however, no helicopters have been procured and the newest in the fleet is now 10 years old. Fleet replacement plans are underway to procure 5 new helicopters (@£38M) and this will see a proposed capital requirement for 2020/21 of £22.4m of which £21m will be Home Office grant. In reality – at least 10 helicopters are presently due for replacement.

During this time NPAS have paid a proportion of capital back to forces annually as compensation for their original investment in the helicopter fleet that was transferred to West Yorkshire Police as lead force, as part of them joining NPAS. In 2019/20 this amounted to £2.4m with further payments due until 2024/25.

Analysis has shown also that NPAS typically spend £4.6m of capital on the purchase of large spare parts for the helicopter and aeroplane fleet. Any part with a value exceeding £10k is considered a capital purchase and as such a significant capital element must be considered part of the annual running costs of air support as if it were an element of the revenue budget.

Calculating the total cost of a flying hour – in aviation the currency used is a flying hour which enables the service to be delivered. To calculate the actual cost to policing of delivering a single flying hour the entire NPAS budget of capital + revenue is divided by the number of flying hours delivered.

In 2019/20 the costs are as follows:

- £42.563m (revenue) + £10.485m (capital after force capital credits) = £53.048m ÷ 16,500 = **£3,215 per flying hour.**

In 2020/21 the predicted costs if fleet replacement is approved will be as follows:

- £44.758m (revenue) + £20.389m (capital after force capital credits) = £65.047m ÷ 18,500<sup>8</sup> = **£3,516 per flying hour.** (or £3942 per flying hour if 16,500hrs is maintained)

This assumes that the aeroplanes enter operational service in late 2019 successfully and deliver at least 2,000 additional flying hours in 2020/21. The proposed fleet replacement of 5 helicopters will also see elevated capital expenditure over the next 3 financial years after which 5 new helicopters will have entered operational service.

### 9.3 Commercial Comparator

There are a number of alternative commercial models available for the delivery of air support services. A complete package including all staff and aircraft is used by the Maritime and Coastguard Agency (MCA) for search and rescue activities. Their service is provided at present by Bristow Group Inc. Police Scotland have a slightly different service provided by Babcock Onshore Limited and can be described as follows:

#### 9.3.1 Police Scotland (Babcock Onshore)

\*\*\*\*\*S31 & S24\*\*\*\*\*

### 9.4 Models Considered (Appendix G)

#### 1. Current ACS funding model

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<sup>8</sup> Flying hours increased by 2,000 assuming aeroplanes deliver this in their first year of operation. Assumes current predicted budgets and also that fleet replacement finance is forthcoming.

The continuation of the current ACS funding model is not considered viable. NPAS service utilisation is dropping and the cost per ACS is increasing. The impact of this is an overall reduction in the value for money of the service. There is evidence that some forces are reducing their ACS usage in order to save money, this has increased the predicted costs of the service to every other user. The predicted 2020/21 costs based upon the ACS model are illustrated in **Appendix G**. Continuing with the current ACS based funding model is not recommended.

## **2. A two-part funding model (subscription with insurance + PAYG)**

The Specialist Capabilities Programme guide to economic pricing models recommends a two-part tariff for collaborations of the scale and type of NPAS. The nature of the high fixed costs associated with air support, together with the limited ability to flex the total capacity of the service to meet transient demand, means that neither a pure subscription only approach, or a PAYG model is likely to be successful.

Many attempts have been made to develop a model that meets the needs of all forces. As models attempt to simulate a fair apportionment of cost –they all by design involve an element of inbuilt subsidy. This means that forces are either subsidised by others, or are themselves providing a net subsidy to others. In the case of aviation this is typically a figure measured in hundreds of thousands of pounds per year. The model included here is a best fit approach, taking the learning from the Specialist Capabilities Programme.

### **Part 1 - Subscription charge with insurance elements**

This would see the agreed fixed costs of NPAS recovered through a subscription charge. This would be paid by all forces and the proportion for each being based upon ability their income (grant + precept), factored against historic usage and predicted future demand.

A significant proportion of the variable costs (e.g. 70% with exact percentage to be agreed) would then be covered by an up-front purchase of insurance flying hours based upon an agreed percentage of historic flying hours use (e.g. 70% with exact percentage to be agreed).

### **Part 2 – PAYG**

Forces would then have the choice as to how much of their remaining 30% of flying hours/demand that they would like to fund at a higher PAYG rate.

Details of how this model may work and costs based upon the 2020/21 revenue budget is included in **Appendix G**. This is still a subsidy-based model which sees many forces pay significantly more than the cost of the service they actually receive.

## **3. Actual cost charging (national + regional elements)**

The commercial aviation world offers a two-part funding approach whereby the fixed costs are covered by a flat monthly fee which is payable regardless of the rate of flying. This fee covers all of the fixed costs associated with the delivery of the specific service required. The actual flying hours used are then charged at an agreed hourly rate + fuel costs.

It is possible to replicate this commercial charging structure, whilst also allowing for a reinvestment back into aviation assets in areas where the service is currently deficient, by simplifying the role of NPAS to that of an internal service provider. This would involve charging regions the exact cost of the service provision required. This would bring several benefits:

- Regions would only pay for the service they receive and there would be no subsidy whereby they were paying for the service of others.
- There is an opportunity for forces to specify the exact service they require in terms of operating hours and flying capacity.
- A national capability is still maintained for the provision of helicopters, maintenance, pilots, spare parts, insurance etc. with local base, personnel and command and control costs picked up locally. This retains the elements of a national collaboration that are known to deliver the most significant benefits.

It is difficult at present to predict precise costs for individual forces using this approach, until a discussion has taken place with each region and the specifics of the base configuration, aircraft type and operating hours have been confirmed.

## 9.5 Recommendations

24. Replacement of the current Actioned Call for Service (ACS) funding model with actual costs being charged to regions, based on the level of service that they specify.
25. Deploy air support in a way that gains maximum operational benefit from every deployment, by completing additional tasks where possible whilst transiting to and from a primary incident.
26. Create an internal air support service provision modelled upon those provided commercially and retain the benefits of national collaboration whilst enabling an operational delivery model that is commissioned according to regional and local need.
27. Remove the subsidy element of air support funding where forces are in many cases actively subsidising the service provided to other forces.

## 9.6 Risks, Interdependencies and Implementation

- There is a risk that the predicted NPAS revenue budget increase for £2020/21 of £1.8m will mask benefits gained from the move to a new funding model.
- The ACS based funding model has seen a significant and sustained decline in requests for air support of around 10% in 2019 (36% over 3 years) and if this trend continues the value for money for this service will continue to reduce.
- Improved availability and responsiveness from optimised bases and aviation assets could lead to an increase in requests for air support and a decrease in some line of sight drone utilisation.
- Forces have a key role and responsibility to work with NPAS to reduce cancelled requests for service.

## 10. GOVERNANCE & DELIVERY MODEL

### 10.1 Delivery Models

#### 10.1.1 Current Delivery Model

The current governance arrangements are intended to support all 43 Policing Bodies and areas in England and Wales. In particular the key functions of the lead Policing Body is to secure the maintenance of an efficient and effective police collaborative service and to hold the lead CC to account for the exercise of their functions and those of persons under his/her direction and control.

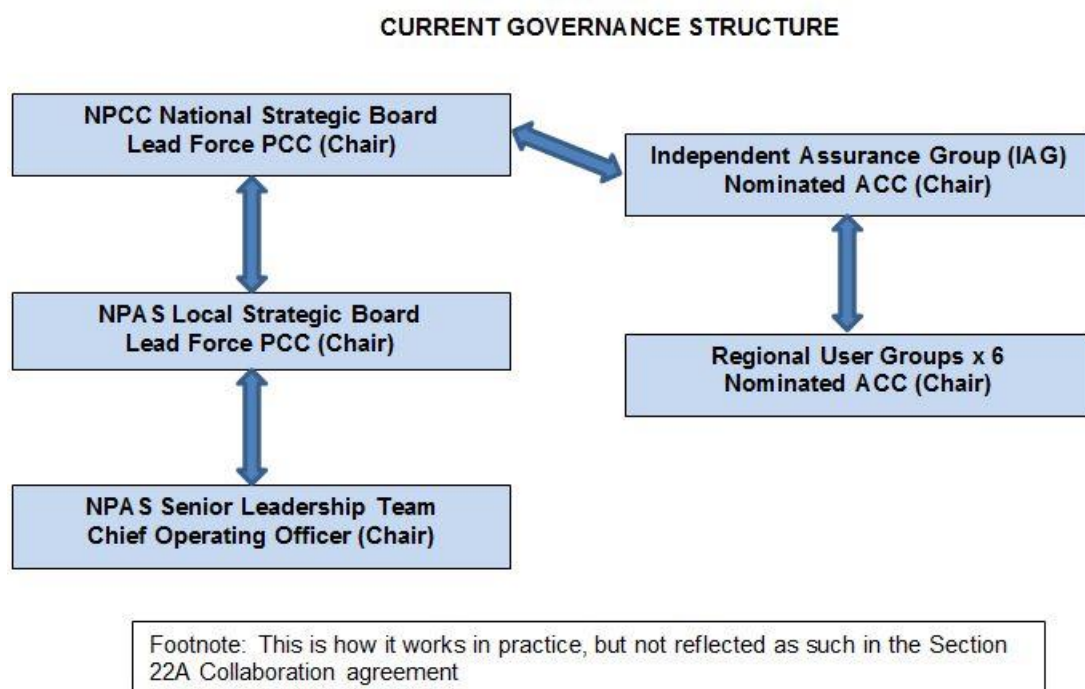
The NSB should set the strategic direction for NPAS and requires the CC (WYP) to account for the operational delivery of the national air support service. The Board also sets and approves the annual revenue and capital budget and determines the operational model for the delivery of air support across England & Wales. The lead PCC is Chair of the NSB, with 6 NPAS regions each nominating a PCC and CC representative from separate forces.

In addition to the regional representatives, the Board includes ex-officio members, for example, the AM, NPCC Aviation Lead, a Home Office representative, IAG Chair and the LSB Chair, who is also the Lead PCC.

The LSB supports the NSB and manages the operational performance of NPAS. The LSB considers all matters brought to the Board by the AM, NPAS' Director of Operations and Head of Business Services. A key responsibility is to ensure there is an efficient and effective service delivered within the assigned budget.

The IAG represents the operational users of air support and monitors NPAS' delivery and reports this to the NSB. In turn, the IAG is supported by the 6 regional Chairs of the RUGs.

The S22A Agreement sets out the detail of the existing Governance Structure.



#### 10.1.2 Stakeholder Feedback

- The National Strategic Board would benefit from industry experts within its membership.
- The NPAS board relies too heavily on its internal knowledge and expertise (drawn from NPAS itself) rather than adopting a more balanced view with more varied representation. Such broader membership would provoke discussion and challenge.
- The Strategic Board would benefit from having an independent chair, ideally someone with no aviation experience to challenge some of the conventions that have constrained police air support and encourage more commercial disciplines.
- The board would benefit from external members with a financial, business and legal acumen. This expertise would help in discharging governance duties.
- A new vision and business plan would provoke renewed interest, define priorities and secure financial planning for the future.
- The whole Service needs to be engaged and help shape the future of police aviation with a new governance model.

#### 10.1.3 Document review and research

HMICFRS – An independent study of Police Air Support November 2017

Nineteen recommendations made.

3 relate to Governance Structure and Delivery



Recommendation 6

Chief Constables Council agreed to recommendation 6 to review alternative Governance models.

*Police Aviation Strategy 2019-2029*

Stage 2 - January – December 2020

Optimise: Identify and Implement a new model for organisation management and delivery of all forms of air support.

*APCC Briefing – Guidance note: Developing National Section 22a Agreements*

A team of lawyers has been tasked to prepare a new template agreement for use in all national collaborations. It is intended that, once approved, it shall be rolled out for use in respect of existing and new national collaboration units. A key area is Governance and Accountability.

*CAP1864 – CAA Onshore Helicopter Review Report*

Provides analysis of safety around police operations in the wake of Glasgow and other accidents/near misses. Highlights concerns over interaction between conventional and remotely-piloted aircraft.

#### 10.1.4 Models Considered

There is a widely held view within the service, across different types of collaborations and not specific to NPAS, that the lead force model is sub optimal. Options assessed:

**1A** - Optimise current NPAS governance - with no structural change.

**1B** - Optimise NPAS governance and create a new overarching National Police Aviation Management Board.

**2** - Adopt the governance model currently being developed for national Section 22A agreements and incorporate all forms of air support.

It should also be noted that the recently published CAA review of Onshore Helicopter Safety made a specific recommendation (R16) that: "Operational control and supervision of all Police Aviation activity should be undertaken by one entity to ensure that all airborne assets are under central control."

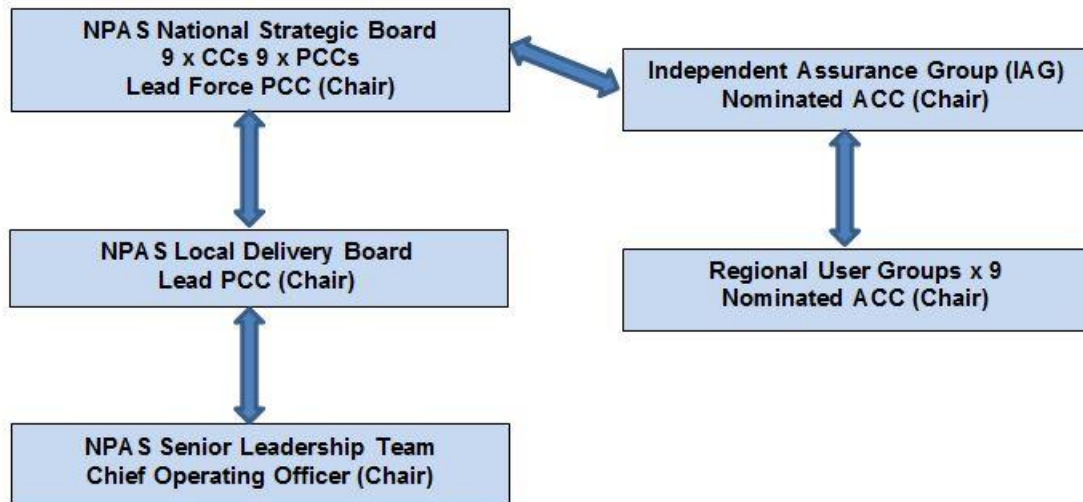
#### **Appendix E – Governance structure charts**

### 10.2 **Potential Future Models**

#### 10.2.1 Model 1A: Optimise NPAS current governance

Maintain the current governance and delivery model, but review membership and reconfigure the regional membership from the 6 NPAS regions to the 9 NPCC regions. NSB would continue to be chaired by the Lead Policing Body (PCC WYP). Incorporate drone governance within this new structure.

## MODEL 1A



The current governance and delivery model would benefit from a broader membership. The 6 NPAS police regions would be reconfigured to the 9 police regions. Forces would be represented by a PCC and CC (both from different forces within a given region) who would represent the views and interests of their region in relation to the delivery of air support.

The benefits of this revised model are very limited due to a continued lack of independence, challenge and scrutiny at strategic level. This option could be sub-optimal in terms of potential to maximise performance and deliver future innovation.

### 10.2.2 Risks

- A lead force PCC Chair would continue to attract a potential conflict of interest and restrict challenge to strategic decision-making.
- The Lead force model is reliant on the continued willingness of the force concerned to maintain the role. There is currently no other force offering to undertake this role.
- The NSB is not sufficiently independent of the lead local policing body for NPAS. There should be clear separation between strategic leadership on police air support and day-to-day management of NPAS.
- The influence of the NPCC Aviation Lead is limited under this model and so the goals of the Police Aviation Strategy 2019-2029 are unlikely to be delivered in full.
- Interviews with forces revealed that there is a lack of confidence from the service in NPAS' ability to deliver effective and efficient air support.

### 10.2.3 Interdependencies and implementation

- The current S22A agreement would need to be revised and ratified.
- All PCCs and CCs would need to feel they are informed, empowered and able to influence decision making and budget setting in particular
- All PCCs and CCs would also need to fully engage in the collaboration with appropriate representation at the Boards.

This model can be adapted to support only 1 of the 3 Service Delivery options, this being:

- Optimised lead force model – standalone police air support.

### 10.2.5 **Model 1B: Optimise NPAS governance and create a National Police Aviation Management Board**

Current governance structures have evolved outside the scope of the collaboration agreement and are impeded by *ad hoc* participation and appropriate representation by some forces. There is also a high turnover

of representatives, especially CCs, and a lack of challenge from independent experts from the aviation industry.

This model would replace the NSB with the National Police Aviation Management Board (NPAMB). The Board could be chaired either by an independent person, lead PCC or from another policing body (although an appointment of an independent chair would support the delineation of governance between the national board and the LSB). The Lead force CC, together with nine PCC's and CC's as regional representatives and *ex officio* members would also sit alongside the NPCC Aviation lead and representatives from CAA, HO, BTP and other partners. It would also be an opportunity to invite industry experts to offer challenge and advice that promotes informed discussion and decision-making.

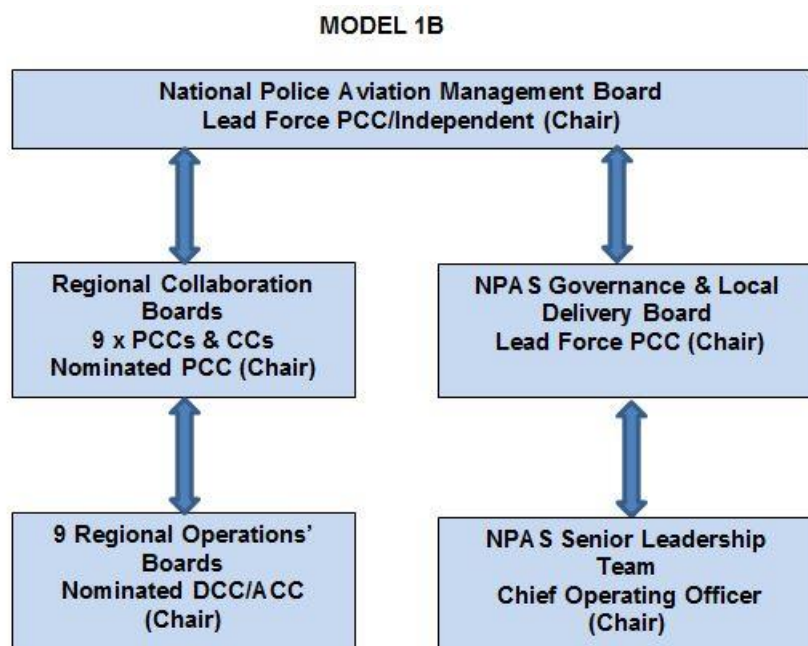
The proposed migration of the existing strategic drone governance into this structure would see that respective NPCC lead become a member of the Board. This would bring a coordinated and blended approach to all forms of current police aviation and complement existing structures.

The NPAS Local Governance and Delivery Board (LGDB) would replace the LSB in name but would continue to discharge its responsibilities in the same way.

It is proposed that Regional User Groups and the Independent Assurance Group would be replaced by existing Regional Collaboration Boards (RCB), where aviation would become an added area of business. Each region would then have a Chief Officer and PCC representative at the NPAMB. In turn, the existing Regional Operations' Boards (ROB) would provide the assurance role and report or recommend findings to their RCB.

Benefits from this model include the opportunities to streamline the governance structures, provide greater oversight of procurement, training standards, current and future aviation strategy. It also ensures greater representation, engagement and opportunity to influence current and future police operational requirements. It would also achieve greater scrutiny, transparency and challenge.

#### 10.2.6 Model 1B:



#### 10.2.7 Risks

- As lead force PCC, to Chair the NPAMB would continue to attract a conflict of interest and focus all elements of organisational risk on that individual and the lead force.
- Continuing with a lead force model is predicated on the continued willingness of WYP to undertake this role, which has been carried on behalf of policing for the last 8 years.

#### 10.2.8 Interdependencies

- The NSB would also need to sanction these proposals and move to 9 police regions rather than the current 6.
- The NSB would also have to agree on the appointment of Chair and the revised membership.
- The current RCBs and ROBs would need to agree to absorb the current roles and responsibilities of the RUGs and IAG.
- The Metropolitan Police structures sit outside this model but would be expected to mirror the structure for engagement.
- The current S22A would need to be revised to take account of these changes and ratified by the NSB.
- This model would not be onerous to implement but it may require additional business support.

#### 10.2.9 Delivery Model Options Supported by this Governance Proposal

This model can be adapted to support the following 2 of the 3 service delivery options:

- Optimised lead force model – standalone police air support.
- Regional Hubs – Internal market solution. Preparatory step for commercial partner by transitioning to an internal supplier and providing individualised services to police regions.

#### 10.2.10 **Model 2: Adopt the governance model currently being developed for National Section 22A Collaboration Agreements**

It is proposed that governance structures are aligned to accord with the outcome of the joint APCC/Home Office/Specialist Capabilities and NPCC work focused on how best to lead collaborated functions. This being a 3 tier structure:

- Policing Board - chaired by the Home Secretary – includes NPCC, APCC and Home Office. Provides strategic overview of policing.
- Aviation Management Board – chaired independently. Includes WYP PCC. Lead CC and NPCC Aviation lead. Includes drone governance. Leads delivery of the Aviation Strategy.
- Local Board/Service Provider Board – chaired by WYP – Focused on the operation of NPAS by WYP. Flexible to change of operator or type of aviation function being delivered.

The Association of Policing and Crime Chief Executives (APACCE) has developed a national template collaboration agreement. The governance model gives an opportunity for all PCCs and CCs to influence relevant collaborations. The model is illustrated below and involves the APCC, the NPCC and a management board for all forms of Aviation – the National Police Aviation Management Board (NPAMB).

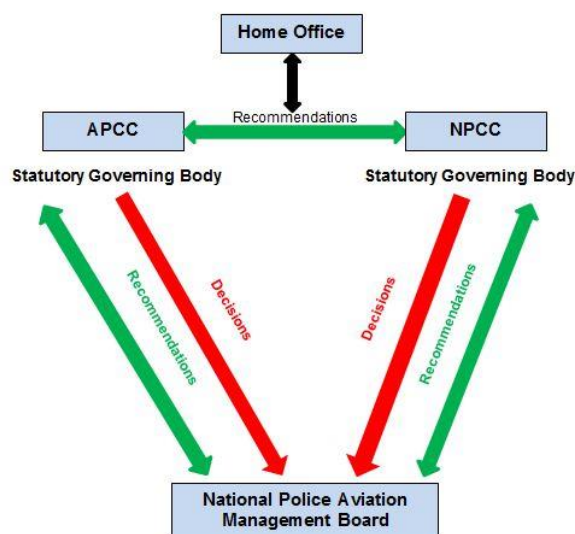
PCCs make decisions on the matters for which they are responsible in relation to NPAS through the statutory governing body of the Association of Police & Crime Commissioners (APCC), i.e. the budget and strategy. Likewise the CCs make the decisions on the matters for which they are responsible in relation to NPAS through the statutory governing body, the National Police Chiefs' Council (NPCC), i.e. the operational requirements.

An independent Chair sits on the NPAMB with a broad membership that includes industry experts, HO representation, LSB Chair, NPCC leads for Aviation and Drones, BTP and CAA. The NPAMB would be able to incorporate all forms of air support and invite or adopt other aviation related programmes of work to sit within the governance structure, e.g. outsourced Beyond Visual Line of Sight Drone (BVLOS) activity and MCA Search and Rescue. **(Illustrated at Appendix E)**

The NPAMB would act on the broader influence of PCC's and CC's through the APCC and NPCC. This process ensures both governing bodies are fully informed, engaged and empowered to make decisions on police aviation. It also removes the need for regional PCC and CC representation on the Management Board.

## Model 2

### National Police Collaborations National Section 22A Governance and Delivery Arrangements



(APCC Briefing can be seen at Appendix F)

#### 9.2.11 Risks

- WYP may feel that this model provides them with insufficient influence over risks that they own and as a result, may give notice to end their hosting as lead force.
- The current NSB may not support this model.

#### 9.2.12 Interdependencies

- A key interdependency is for the National Collaboration Section 22A template to be ratified and adopted by the APPC and NPCC.
- This model would not be onerous to implement but it would require additional support from the HO in terms of presence, support and oversight.

#### 9.2.13 Delivery Model Options Supported by this Governance Proposal

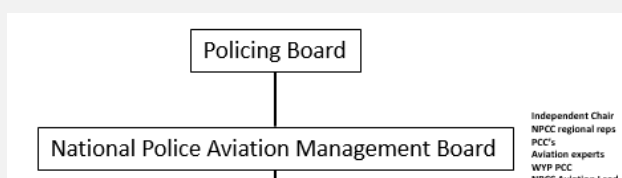
As a national police collaboration, NPAS would be included within National Section 22A Governance and Delivery Arrangements.

This model can be adapted to support any of the 3 service delivery options:

- Optimised Lead Force Model
- Regional Hubs – Internal market solution. Prepared for commercial partner by transitioning to an internal supplier and providing individualised services to police regions.
- Strategic Delivery Partner – External market solution – including extended partnership with other emergency services.

## 10.3 Recommendations

29. Adopt a 3 tier governance structure as recommended by the APACCE.



32. The existing Police Aviation Sec22a agreement should be revised and ratified to take account of options agreed by Chiefs.
33. Remove the Independent Assurance Group and establish an aviation assurance process within the Regional Collaboration Boards' framework.
34. Migrate current NPCC drone governance and align with broader air support governance structures.
35. Recruit an independent chair for the newly proposed National Police Aviation Management Board.
36. Board membership should be broadened to incorporate industry experts and other key agencies.
37. Clear delineation is required between the roles and responsibilities of the National Police Aviation Management Board and the Local/Service Providers Board.

## 11. SUMMARY









Whilst continuing to focus on how best to keep the public safe - the single biggest strategic choice for Chief Constables is whether to continue to invest the necessary scale of *additional* capital (£70M+) and £3-5M p.a. of revenue funding in order to restore standalone police air support, capable of providing a level of operational effectiveness that attracts the broad confidence of forces. Or in contrast, pursue a *new direction* towards stable cost and higher gain options by engaging with a strategic partner with commercial aviation expertise. This could be further enhanced by exploring opportunities to exploit economies of scale and improve service by creating an ambitious integrated emergency services air support organisation with agencies such as Maritime and Coastguard Agency (MCA and other 'blue light' organisations.

## 12. SUMMARY OF RECOMMENDATIONS




12.1 A summary of recommendations is illustrated at **Appendix A**

**Chief Constable Rod Hansen**  
**NPCC Aviation Lead**

## 11. APPENDICES

A	Summary of recommendations	****S31 & S24****
		****S31 & S24****
B	HMICFRS Report 'Planes, Drones and Helicopters'	 Appendix B HMICFRS - Planes Drones and Ae
C	Optimised Response Performance Forecast	****S31 & S24****
D	Analysis of current drone usage by police in England & Wales	S31 S24
E	Governance models - diagrams	 Appendix E Governance Models.pc
F	APCC Briefing – National S22 Agreements	 Appendix F APCC Briefing .pdf
G	Funding Models	 Appendix G - NPAS Funding Model options
H	NPCC Aviation Strategy	 Appendix H - NPCC Police Aviation Stratey
I	NPCC Aviation User Requirement	 Appendix I Air Support Operational U
J	Summary of feedback from forces	****S31 & S24****
K	Modelling assumptions	 Appendix K- Modelling Assumption
L	Graph showing NPAS costs and output trends 2016-2020	 Appendix L NPAS ACS per hour 2016-2018 v.



M	Understanding NPAS budgets	 Appendix M Understanding NPAS c
N	Specialist Capabilities – Funding Model	 Appendix N Spec Cap User Guide.pdf
O	Forces Questionnaire	 Appendix O Questionnaire.pdf
P	Examples of NPAS demand heat maps	****S31 & S24****