

Dear Secretary of State

We write to you as 13 of the Police & Crime Commissioners in England & Wales.

It is important to state up front that we fully accept that more needs to be done to reduce reoffending if we are to cut crime and make our communities safer. Therefore, we welcome plans to extend supervision of offenders to those in sentences of less than 12 months. However, we have grave concerns at your plans for dismantling the Probation Service, which we do not believe will lead to better outcomes and could, in fact, have major consequences for public safety. There are four major reasons for our concern.

First, losing Probation Trusts that know and understand their local areas would be a mistake. Trusts have built constructive working relationships with voluntary groups, the private sector and public agencies such as the police. Trusts are best placed to commission the services that are appropriate to the needs of their area. Some genuinely innovative work has been led by Probation Trusts, including the intensive alternatives to custody (IAC) pilots. By abolishing trusts and commissioning services direct from Whitehall crucial local knowledge and important networks will be lost.

Second, fragmenting the service on the basis of an offender's risk level will introduce dangerous and artificial barriers between providers. This fragmentation fails to take into account the way risk levels fluctuate in up to a quarter of cases of those under supervision. Given it is also not clear where day to day responsibility for offenders lies, we believe this over complicates a system where too much bureaucracy and unclear lines of command could see dangerous offenders walking our streets unsupervised.

Third, we are unhappy at the outsourcing of the day to day supervision of almost 200,000 offenders. While we support the involvement of other providers in delivering specific projects, we believe that it is less bureaucratic and safer for the public if Probation Trusts maintain day-to-day responsibility for offenders, commissioning in those they see fit

In particular, we are alarmed that companies currently under investigation by the Serious Fraud Office and the National Audit Office for discrepancies in other Ministry of Justice contracts may be awarded the work. The public will rightly be alarmed at the prospect of companies that have failed elsewhere being in charge of supervising serious and violent offenders in their communities.

Fourth, we are concerned at the speed at which this is being implemented. The plans represent a considerable upheaval - abolition of trusts, privatisation, imposition of a payment by results model - all done without any piloting or testing to see what works and what doesn't. In addition, although we welcome the extension of supervision to those on sentences of less than 12 months, it is not clear how this considerable increase in workload will be funded, thus we have concerns existing funds will be spread more thinly.

By rushing ahead at a fast pace the risks of failures is increased, again putting public safety at risk. This was all highlighted in your department's own internal risk assessment. We are particularly alarmed that this is being done without seeking the explicit approval of Parliament but is instead hiding behind the 2007 Offender Management Act, which was intended for an altogether different use. This looks to some as avoiding scrutiny, which is an important part of any policy making process, and helps to avoid poor implementation and mistakes.

We are therefore calling on you to halt the process, step back and work with the police, Probation Trusts, and all the other agencies involved to deliver lower reoffending rates in a way that does not put public safety at risk.

We look forward to hearing your views.