Recent decades have seen a growing ‘pluralisation’ of policing providers and authorisers in liberal democracies (Crawford 2003, Johnston and Shearing 2003). Some have interpreted this as part of a major transformation of policing in western liberal democracies that reflects fundamental shifts in the nature of governance (Bayley and Shearing 1996, 2001). Others have stressed continuities with the recent history of policing and the persistence of significant national and local differences in policing structures (Jones and Newburn 2002, Ferret 2004). These discussions have some parallels with wider debates about convergence and divergence in penality and the ways in which structural and cultural shifts influence policy developments across different societies (Garland 2001). We here examine recent changes in policing within two EU countries – Britain and the Netherlands. This paper discusses areas of similarity and difference in plural policing developments, and speculates about what factors might explain these. There is evidence of structural and cultural shifts working to shape policing in similar ways, but also of the mediating influence of distinctive national and local political institutions and cultures. These particular contexts provide possibilities for the resistance and re-shaping of global forces, as well as provide a framework for the emergence of distinct policy innovations.

Keywords: plural policing; governance; transformation; convergence; divergence; comparative research; England & Wales; the Netherlands

Introduction

This paper places debates about developments in the policing systems of western industrial economies within the broader context of ideas about convergence and divergence in crime control and penal policy. In recent years, two distinct approaches to understanding and explaining change have been visible in the literature on penalty. One approach highlights the convergent elements of crime control and penal policy across different jurisdictions and explains these developments primarily with reference to fundamental structural and cultural shifts experienced in similar ways by many ‘late modern’ societies (Christie 2000, Garland 2001). By contrast, other studies emphasise divergence and difference between national (and indeed, sub-national) contexts, and these tend to privilege the influences of political institutions, cultures and historical traditions in shaping policy outcomes (Tonry 1999, 2001, Melossi 2004). Garland (2001, p. vi) has explained the contrast...
between these approaches as the arising partly from the inevitable differences
between viewpoints that attempt to develop a ‘broad generalisation’ and those that
concentrate on the ‘specification of the empirical particulars’.

Some similar themes can be detected in research and writing in the field of
policing and the governance of security. In recent years, debates have arisen about
the extent to which developments in the policing systems of industrial democracies
should be interpreted as signalling a more general transformation of policing
arrangements. One influential body of writing focussed upon broad similarities
between different national contexts, and in particular the USA and the UK. This
work emphasised large-scale transformation and implied – although perhaps less
explicitly than those writers concerned with penality – that deeper structural forces
are behind the emergence of radically changed policing arrangements (Reiner 1992,
Bayley and Shearing 1996, 2001). By contrast, other work has emphasised
continuities with the past, the contingent nature of policy development, and
differences between policy trajectories in different political and legal contexts

We should state at the outset that none of these bodies of work suggest simplistic
pictures of cross-national convergence on one hand or the stubborn persistence of
national difference on the other. Indeed, these debates have become more nuanced
with influential writing on conceptual and empirical shifts in policing – away from
state-centric and towards ‘nodal’ forms – laying great emphasis on the uniqueness
and subtleties of local situations (Johnston and Shearing 2003, Wood and Shearing
2007). This stresses the need for comparative work on plural policing landscapes
(Wood and Kempa 2005) and the comprehensive ‘mapping’ of security networks
within various jurisdictions (Dupont 2006). Most authors would agree on the
importance of developing cross-national comparisons for a better understanding of
what is happening to policing across different nations. Such studies are a pre-
condition for a more detailed understanding of the inter-relationships between
broader social and economic shifts being experienced in similar ways by many
countries, and the more localised influences including those of specific political
institutional contexts and cultures, historical traditions and the agency of political
actors.

In addition, cross-national comparison can further our understanding of the
different ways in which conceptual shifts regarding governance and policing are
matched by empirical developments in the nature of policing arrangements. To
illustrate this, we here explore developments in policing in two EU jurisdictions, the
Netherlands and England & Wales. Whilst elements of ‘broad generalisation’ are
clearly visible, and can be related in some ways to broader social and economic
trends, differences in the ‘empirical particulars’ between the two jurisdictions suggest
that context continues to exert a very significant influence on policy trajectories. In
particular, we suggest that the persistence of differences related to national and local
political institutions and cultures underlines the vital importance of understanding
the ‘politics of policing’ in different national contexts.

The importance of cross-national comparative research
Despite growing scholarly attention to the pluralisation of policing, there remains a
relative dearth of cross-national comparative research in this field (Jones and
Newburn 2006, van Steden 2007) – a ‘blind spot’ in research programmes that is reflected in the lack of international comparisons in police studies more generally. Until relatively recently, most published policing research in English was concerned with policing developments in North America and the UK. In this sense, policing research simply mirrored the ‘strikingly uncomparative’ nature of criminological research in general (Downes 1993, p. 2). According to Mawby (1999) this can be explained by a misunderstanding of central concepts, the lack of comparable data, ethnocentrism and pragmatic reasons of language, access and expense. Many of these issues present particular problems for comparative researchers in the field of policing and criminal justice, which remain closely tied to national identities and ideas of state sovereignty (Jones and Newburn 2006). There is a small body of research that draws comparisons between the structure and organisation of policing in different societies (Bayley 1976, Shane 1980, Bayley 1985, Benyon et al. 1994). However, with the important exception of Bayley’s work, this has been at a broad level of generality and on the whole has not developed detailed analyses of policing policy or sought general explanations for differences and similarity (Jones 1995). Yet, at the same time, there seems increasing awareness of the vital contributions cross-national comparisons can make to criminological knowledge. Comparative criminology is of fundamental importance for understanding the similarities and differences between national contexts, and to gain deeper insights into the operation of social processes in different jurisdictions around the world. In particular, international comparisons have much to contribute to criminological debates focusing upon convergence and divergence in the criminal justice and penal systems of different societies (Jones and Newburn 2007). Comparative research reminds us that it is important to document and understand difference as well as similarity, and that national and local political contexts continue to exert an important influence on policy trajectories.

In this paper, our aim is to provide a preliminary account – based primarily on secondary sources – of similarity and difference between two jurisdictions as an illustration of how cross-national research can contribute to better understanding of how policing landscapes come to be the way they are. Further detailed empirical research is required to explore what lies beneath these similarities and differences, and in particular, the development of systematic comparative analysis of the policy making process in both countries. But even at a relatively broad level, comparison between Britain and the Netherlands is useful and informative for a number of reasons. The two nations exhibit a number of strong similarities, but at the same time there are some important differences between them. Both are parliamentary democracies and long-standing members of the EU, both have regionalised police systems and, as is outlined below, have in many ways experienced broadly similar developments in terms of growing pressures for reform of public policing, the expansion of public policing and commercial security, and the emergence of other forms of policing provision. Historically, there has been close cooperation between the Dutch and British police services, and a number of examples of ‘policy learning’ between the two nations (Jones 1995). At the same time, there are also important contrasts that make this comparison particularly interesting. The UK political system is ‘majoritarian’ rather than ‘consensual’. It is dominated by two large political parties and a ‘first past the post’ electoral system that almost invariably results in single party government. By contrast, the Netherlands has a strong system of ‘proportional representation’ and, partly as a result of this, a highly fragmented
party system which invariably results in coalition government. Thus, politics (and therefore ‘the politics of policing’) are very different in each country.

**Plural policing in the Netherlands and England & Wales: parallel developments?**

There are a number ways in which the policing systems of the Netherlands and England & Wales have experienced apparently similar developments under the broad rubric of ‘pluralisation’ (Jones and Newburn 2006). We review several distinct dimensions of pluralisation here, including the expansion of the commercial security sector, the emergence of new forms of public patrol provision, and reform programmes intended to promote improved performance effectiveness on the part of the public police.

There has been a very substantial increase in employment in commercial security functions in both countries. Recent estimates suggest that there are between 250 and 400 commercial guarding companies operational in the Netherlands. In terms of annual turnover, it is evident that Dutch private security has expanded rapidly in past decades. Empirical research reveals an increase in industry turnover from €429 million in 1994 to €1.16 billion in 2005. This expansion is also visible in personnel numbers that grew from about 10,000 contract guards in 1980 to 32,000 at present, excluding the ‘in-house’ security sector which probably a further one or two thousand employees (van Steden 2007). In Britain (there are no separate data for England & Wales), the security sector has expanded considerably in recent years (Jones and Newburn 2006). In the mid-1990s, Jones and Newburn (1998) estimated that there were over 7000 private security firms operating in Great Britain, although this figure was not restricted to companies providing security guarding services. Recent figures suggest a market size of over £3.5 billion (£2.6 billion) working in security guarding and related (Keynote Report 2004) and employment of over 160,000. It is difficult to gather reliable data to measure trends over time, but comparable figures from the Census of population suggest that the security guarding sector employed about 67,000 in the early 1950s.

Another example of similar developments concerns the emergence of new forms of public patrol in both jurisdictions. In the Netherlands, a new form of police patrol – the ‘police patroller’ (politiesurveillant) – was established in 1990 to undertake surveillance functions (Hauber et al. 1996). Police patrollers are equipped with handcuffs and a baton, but only have limited training and powers compared to their fully fledged colleagues. This makes them much cheaper than conventional police officers; yet patrollers still represent symbolic government authority, giving them considerable advantages over commercial initiatives. In England & Wales (though occurring much later), the Police Reform Act of 2002 established a new ‘patrol’ rank in the police service (‘Police Community Support Officer’ or PCSO), intended to provide a ‘second tier’ of policing. These officers undergo more limited training than uniformed constables, and operate with limited legal powers, but provide a uniformed presence on the streets and complement the work of police officers. The Police Reform Act 2002 provides chief constables with the discretion to give PCSOs powers to deal with anti-social behaviour and disorder. By mid-2008, there were about 16,000 PCSOs working with police forces in England & Wales (Bullock 2008).
New forms of public police auxiliaries – employed by municipalities and other non-police bodies – have also been established in both jurisdictions. During the 1990s, a number of Dutch municipalities appointed teams of uniformed ‘city wardens’ (stadswachten) in urban areas. What started as a project for long-term unemployed in 1989 became increasingly popular. Due to cuts in government job subsidies, however, the expansion of city wardens seems to be over. Currently, there are 2000–3000 such personnel working in the Netherlands. In some municipalities, they are mandated to issue on-the-spot fines for relatively minor offences such as public urination, public drunkenness and other forms of disorder. Similar forms of municipally employed uniform patrollers have emerged in the UK, most recently via the national ‘neighbourhood wardens’ programme (Crawford 2003). Between 1500 and 2000 wardens were employed in England & Wales following central government programmes to encourage new forms of patrol provision. As well as being deployed by local government, some schemes were employed by housing associations and residents’ groups (Crawford and Lister 2006). Prior to this, some local authorities had employed their own ‘in-house’ security personnel with a remit to undertake public patrols (Jones and Newburn 2006).

Another kind of ‘policing’ provision has emerged in recent years with the development of ‘citizen-led’ patrols organised on a voluntary basis by local communities. A Dutch example is the Moroccan ‘community fathers’ (Marokkaanse buurtvaders) who have become widely recognised for their work to promote safer neighbourhoods in Amsterdam and The Hague. Their primary goals are to forestall public nuisance caused by anti-social behaviour among Moroccan youth and to establish fruitful contacts with their parents. This form of ‘responsible citizenship’ (Johnston 1992) has been encouraged due to alleged ineffectiveness on the part of the authorities to discipline Moroccan youngsters and promote their integration into Dutch society. In England & Wales there have also been developments in policing ‘below’ the level of state government (Loader 2000). In part, this has arisen from a deliberate government policy of ‘responsibilisation’ of non-state organisations to take control of their own security (Garland 2001). However, perhaps a more significant factor has happened independently of state government, arising from the activities of ‘private governments’ in defining private orders and enforcing their own norms (Shearing 2006). A number of authors have highlighted the growth of ‘citizen-led’ policing including the expansion of ‘Neighbourhood Watch’ schemes since the early 1980s, and more recent forms of citizen patrolling. Activities that might once have been viewed as vigilantism are now actively encouraged by state organisations. Although it is impossible to quantify trends in the frequency of vigilante type actions, it has been suggested that such phenomena are increasing (Johnston 1992, 1996, BBC 1999).

A further area of parallel development concerns what has been happening to public policing in the two countries. Both have seen a significant expansion of expenditure on public policing, and a growth in police staffing numbers. The Dutch police have enjoyed sizeable investments in terms of funding and staff numbers over recent years. Expenditure on police regions went up from nearly 2000 to about 3500 million euros over the last 14 years, and staffing has expanded considerably over the past decade or so to about 53,000 at present. The same period also saw a significant expansion in police staffing and resources in England & Wales. The total gross revenue expenditure on policing in England & Wales increased from £8578 million in
1996/1997 to £12,015 million in 2006/2007, a real increase of 40% over the decade (Home Affairs Committee 2007). In 1993, the number of police officers was about 128,000. This number expanded to record levels of about 143,000 in 2006. The equivalent figures for total police staff (including civilian administrative and support staff) is 178,000 in 1993, growing to 228,000 in 2006 (by that time police officers constituted about 63% of total police staffing). Despite the significant real growth of police staff and resources, both countries have seen ongoing concerns about police effectiveness and public fear of crime and disorder. In both the UK and the Netherlands there have been debates about the ‘core tasks’ of the police and how to deliver them most effectively (Morgan and Newburn 1997, van der Vijver et al. 2001). There has been an increasing emphasis in both jurisdictions on the systematic measurement of police performance and the imposition of centrally set performance targets.

In England & Wales, this dates back to the early 1980s, but has really gathered pace since the late 1990s as part of a broader drive to ‘modernise’ public service under New Labour governments. These developments have appeared later in the Netherlands, but became increasingly important in this country too. The Dutch government has introduced performance measures, which translate into contracts with targets, for example, about the number of arrests to be made. Whilst these contracts are less stringently enforced than in the UK, they have attributed to cultural changes towards higher outputs and better transparency within the police force. Another impact of concerns about organisational effectiveness has been the emergence of further major structural reorganisation proposals in both countries. In November 2005, the Dutch government proposed new reforms (Stuurgroep Evaluatie Politieorganisatie 2005). Its point of departure was a ‘concern model’ to assure more centralised (and apparently more effective) controls over police regions.

In the same year, an official report from Her Majesty’s Inspectorate of Constabulary (HMIC) in England & Wales concluded that the current organisation of policing into 43 provincial police forces was ‘not fit for purpose’ in terms of dealing with serious and organised crime, terrorism and other protective services (O’Connor 2005). The Home Office immediately declared its intention to re-structure policing in England & Wales into about 12 ‘super-forces’, although ultimately these proposals became mired in controversy and were shelved in 2006 (Loveday and McClory 2007).

The persistence of difference: exploring the ‘empirical particulars’

Within these important areas of broad similarity, closer analysis reveals a number of areas of significant contrast between developments in England & Wales and the Netherlands. Such differences require a cautious approach to broad generalising theories about the extent, causes and consequences of ‘pluralisation’ of policing, and remind us of the importance of local and national contexts. These differences particularly include contrasts between the extent and nature of commercial security growth in the two countries, the more extensive regulation of the commercial policing sector in the Netherlands, and the much more radical moves to the ‘marketisation’ of public policing that have occurred in England & Wales.

The relative size and nature of the public and commercial security sectors differ in important ways between the two jurisdictions. Comparative figures suggest that England & Wales has a much higher number of police officers relative to the total

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population. For police officers per 100,000 population, the respective rates for England & Wales and the Netherlands are 347 and 254 (Pakes 2004b). The private security industry is smaller overall in the Netherlands compared to the UK. Figures show that in 2004 Britain had a proportionately greater number of guarding personnel, with about 275 per 100,000 population compared with 187 in the Netherlands (van Steden and Sarre 2007). Thus, overall, it is reasonable to conclude that in terms of formal personnel, the policing sector as a whole (public and private) is considerably larger in England & Wales than in the Netherlands. There are also important differences when comparing the ratio of private security to public police in the two jurisdictions. According to 2004 statistics, in terms of staff numbers, the British security industry slightly outnumbers the police (a ratio of 1.06) whereas the Dutch industry shows a ratio of 0.61. This indicates that public police forces are still numerically dominant in the Netherlands (van Steden and Sarre 2007), unlike Britain. Not only is the Dutch commercial security sector smaller proportionately than its counterpart in England & Wales, it is considerably more restricted in its functional remit. There are a number of examples of this. In England & Wales, commercial companies have since the 1990s financed, designed, built, managed and staffed prisons (and institutions for young offenders) (Jones and Newburn 2004). As a proportion of total inmates, private prisons are more significant in England & Wales than they are in the USA. During the early 1990s, the function of guarding prisoners on their journeys between court and prison (and guarding them in the court itself) has been contracted out to commercial security companies. Commercial companies are also heavily involved in the provision of electronic monitoring of convicted offenders (Jones and Newburn 2007). Commercial involvement in the Dutch penal system remains much more restricted. Although private companies are involved in the provision of some (ancillary) guarding and maintenance services, the issue of wholesale contracting out of penal establishments has yet to appear on the policy agenda in the Netherlands.

The spatial remit of Dutch private policing remains substantially more circumscribed than that of British commercial policing providers. As well as becoming omnipresent in the standard examples of ‘mass private property’ (Shearing and Stenning 1983) – shopping centres, leisure and retail parks, sports stadia, airports and the like – in England & Wales, commercial policing is increasingly visible in the public spaces of streets, parks and residential neighbourhoods (Noaks 2000, 2008). While this politically sensitive development is also visible in the Netherlands – private security patrols in affluent residential enclaves have existed for many years – there is little evidence that there has been a more general expansion of private policing on residential estates in middle and lower-income areas. Except from some local initiatives, there has been no political support for a policy aimed at the direct stimulation of a mixed market for patrol provision. This is, however, different in Britain where the creation of neighbourhood warden schemes and PCSOs has coincided with official recognition of what has been called ‘the extended family of policing’ (Home Office 2001). Along with the decentralisation of some local government budgets, this has created the conditions for emerging local markets in security provision, comprising the police, other public police auxiliaries such as wardens, and the commercial security industry (Crawford et al. 2005, Crawford and Lister 2006). Arguably, the introduction of statutory regulation of the private security industry in the UK (see below) marked a deliberate attempt by the
government to legitimate private security as a player in the policing market. In the longer term, these changes may result in a reassertion, at least to a degree, of state control over the market for patrol services. Regulation of private security may have increased the average cost of contract security rendering it less attractive to prospective buyers. In addition, the availability since 2002 of a ‘cheaper’ form of police patroller may have enabled public police forces to compete more effectively with commercial providers. Further empirical research is required to explore the ongoing changes in the market for policing patrol in England & Wales. However, even though this may now be changing, it remains the case that the past decade has seen considerably greater growth in local policing markets in England & Wales than has been the case in the Netherlands.

Unlike England & Wales, there is a long history of statutory regulation of commercial policing in the Netherlands (Button 2007). In 1997 Act on Private Security Providers and Detective Agencies replaced the old 1936 Paramilitary Organisations Act. Systems of regulation have been further strengthened with all commercial security companies required by law to register with the Ministry of Justice. In order to obtain a license, applicants must make sure that they employ trustworthy and skilled staff. If companies meet the criteria for criminal background checks, training requirements and educational qualifications, certification is granted for a term of five years. Responsibility for screening security employees lies with the local police force in the area in which the security company is based. Additionally, the industry itself implements quality standards on ethics, training, health, safety and the improvement of career opportunities. Together with the Unions, the Dutch Association of Private Security Organisations (VPB) negotiates collective industry-wide agreements.

In contrast to the Netherlands, until quite recently the British security sector was subject only to a form of voluntary self-regulation via membership of professional associations that were widely acknowledged to represent only a fraction of firms. The Private Security Industry Act 2001 established a Security Industry Authority (SIA) to license individuals operating in particular parts of the security sector. This includes contract staff working in cash-in-transit and static guarding functions, door supervisors (contract and in-house), wheel clammers (contract and in-house), bodyguards, private investigators and security consultants (Button 2002). All employees in these areas now require licenses to operate, part of which involves a clean criminal records check. The Act did not introduce the compulsory licensing of security firms, but was limited to a voluntary scheme via which firms submit themselves for regulation. The system of regulation has been criticised for being too narrow, excluding significant sectors of the security industry such as security systems installers and in-house guards. Some critics have suggested that the voluntary licensing scheme amounts to little more than a continuation of the largely ineffective existing system of voluntary self-regulation, in which ‘large numbers of firms are not inspected by … inspectorates or by any other organisation’ (Button 2002, p. 128).

Another area of significant contrast between the Netherlands and England & Wales concerns the nature and extent of ‘market’ reforms to public policing. Such reforms include the actual privatisation or contracting out of public police tasks, which have been much more far reaching in England & Wales than in the Netherlands, and show signs of accelerating further. The scope for privatisation in England & Wales may expand as the government follows the proposals contained in
official reports on workforce ‘modernization’. These have recommended the deployment on some core police functions (such as crime investigation) of a more eclectic mix of police staff, including police auxiliaries as outlined above, civilian (non-executive) police staff, privately contracted personnel working within the police service, as well as traditional police officers (HMIC 2004, Flanagan 2008). Many of these roles remain unambiguously those of the public police in the Netherlands, where no serious proposals have been put forward to contract out what are perceived as core police functions.

A further aspect of marketisation concerns the development and application of performance management frameworks, which have now become closely incorporated into the everyday routines of policing in England & Wales. National performance objectives, coupled with (often quantitative) performance indicators and targets (mostly set by central government) have grown in detail and rigour since their introduction in the mid-1990s. Police forces in England & Wales are now subject to an intricate web of performance measures covering a wide range of policing tasks. Between 2004 and 2007 the various national performance indicators were published annually, with forces’ performance compared in detail with that of other similar forces, as part of the Police Performance Assessment Framework (PPAF). Prior to 2006, HMIC, who conduct regular inspections of police forces to assess performance, could report ‘under-performing’ Basic Command Units (BCUs) and forces to a Home Office ‘Performance Review Committee’ which could refer them to the Police Standards Units (PSU) for intervention. The Police and Justice Act 2006 now means that the Home Office can intervene directly in forces perceived to be performing badly, without waiting for a critical report from HMIC. All this represents a formidable set of levers for central government to shape local policing and direct it towards priorities that it feels are important (Jones 2008).

Although measurable outcomes and targets have undoubtedly become a more important feature of Dutch policing, developments in England & Wales go way beyond what is in place within the Dutch police. Performance indicators of this kind have never been institutionalised to such a degree and, indeed, seem increasingly out of fashion in the Netherlands. There appears to be a predominant view among Dutch policy makers and practitioners that many aspects of police work are simply unquantifiable, especially those concerning interactions between officers and citizens. Currently, the pendulum appears to be swinging back towards more ambiguous community policing strategies in the face of public doubts about the usefulness of strict performance ‘contracts’ that focus on crude indicators of enforcement such as numbers of fixed penalty fines issued (Hoogenboezem and Hoogenboezem 2005). One other important example of market-style reforms the encouragement of public police organisations to contract with private and parochial interests to ‘sell’ policing services. In Britain, this has a long history dating back into the nineteenth century, although the practice diminished in the years 1945–1980 (Williams 2008). However, recent years have seen a major expansion in income generation by and private sponsorship of individual public police forces. As well as gaining general sponsorship from outside bodies, police forces have contracted with local government, residents’ groups and housing associations to provide dedicated patrol resources for particular areas, and have been able to charge the organisers of mass public events (such as rock concerts or football matches) for the policing services that they deliver (Jones and Newburn 1997). This formal practice remains unheard of in the Netherlands. The
government’s official stance is that, because police officers have a fundamental responsibility for protecting all Dutch citizens, private financial interests should not be able to influence public services via commercial funding.4

Understanding similarity and difference

Developments in policing occur within the context of a complex mesh of local, national and international influences, as well being shaped by historical traditions. It is hardly surprising, therefore, that anything that goes beyond a sweeping look at developments in two jurisdictions should find evidence of both similarity and difference. Furthermore, most authors writing about convergence and divergence would not attempt to present a simplistic model suggesting that countries are becoming completely alike on the one hand, or stubbornly distinct on the other. Indeed, it is clear that the closer one looks at developments in crime control and penal policy, the more complicated the picture becomes. As Levi-Faur and Jordana (2005, p. 194) note, ‘the process of policy diffusion may involve convergence and divergence at the same time’. This complexity is also present in the field of policing, and their notion of ‘convergent divergence’ is one potential way of capturing the nature of what is going on here. However, broad generalising approaches must pay due regard to the empirical specifics. This allows a more nuanced understanding of how policing policies, and policing structures, come to be the way they are, and crucially, how they might be shaped in the future.

Understanding similarities: governments under pressure

The documented changes in policing in the Netherlands and England & Wales – and, to differing degrees, similar developments in other parts of the world – do suggest that fundamental forces are at work. These include wider changes in social and cultural configurations conducive to increasing insecurity and the growing politicisation of crime control that give rise to similar policy dilemmas and make certain policy choices more politically attractive. Similarities in policy trajectories can also be identified, in terms of the general shift towards the simultaneous adoption of primarily expressive and punitive criminal justice policies, and the promotion of more pragmatic instrumental approaches that emphasise the management of risk and the reduction of costs (Garland 2001). For many decades the Netherlands was seen as an outlier in terms of criminal justice and penal policy because of what was widely viewed as a comparatively tolerant and permissive approach. In particular, commentators focussed upon the Dutch incarceration rate that for many years was significantly lower than those of other western countries (Downes 1993). This distinctive approach to penal policy was related to the relative insulation of Dutch penal policy making from populist pressures, and to political and cultural traditions of tolerance and accommodation between different groups in society. However, in the past decade or so, the Dutch incarceration rate has expanded rapidly and is now similar to, or greater than, those of other European countries (although still considerably less than the USA). In addition, commentators have noted the emergence of what has been termed ‘a politics of discontent’ (Pakes 2004a, 2005) that has manifested itself in a more punitive and populist discourse about crime and immigration. Indeed, it has been suggested that elements of Garland’s ‘crime control
complex’ are becoming more visible in the Netherlands (Pakes 2005, van Swaaningen 2005). There is not the space here to discuss the detailed body of work that explores these changes (Jones and Newburn 1998, Boutellier 2004) but undoubtedly the increasingly private and individualised nature of social life, the more general sense of insecurity associated with those broad structural changes generally described as globalisation, and with the process of commodification of ‘security’ itself (Loader 1997) all work – no doubt in complex ways – to stimulate the continued expansion and proliferation of new forms of protection and reassurance. This widespread ‘search for security’ (Law Commission of Canada 2002) relates to the fact that, in Britain and the Netherlands alike, the police have faced overall trends of growth in crime and disorder over the past 40 years (although in the last decade, both countries have seen falling crime rates). (Perceived) risks of victimisation have become a ‘normal’ social fact of life (Garland 2001). Yet, at the same time, governments in both countries are increasingly cost conscious in allocating resources to the criminal justice systems and also realise that the traditional judicial emphasis on prosecution, punishment and detention has its limitations. In particular police forces have helped to establish ‘preventative partnerships’, which create a whole new infrastructure of crime control beyond the institutional remits of the state (Loader 2000, Garland 2001, Hughes and Edwards 2002, Hughes 2007).

To date, these discussions have focussed on penal policy in general and rather than policing in particular. However, it is certainly the case that studies of policing have identified broad similarities in the broader structural and cultural frameworks of the Netherlands and Britain within which detailed policy outcomes emerge. As noted above, there are broad parallels in terms of policy outcomes in response to these pressures. Both are liberal democratic parliamentary democracies and members of the EU, operating in an increasingly globalised world. Global pressures have certainly contributed to a ‘hardening’ of policing approaches in the Netherlands. This has occurred both via international pressures in the field of drugs enforcement (Pakes 2004b) and also via particular examples of policy transfer such as the conscious emulation of elements of ‘New York’ style quality of life policing in Dutch cities (Punch et al. 2002, van Swaaningen 2005). As noted above, both countries have seen crime and policing become an increasingly politicised issue in recent decades, although these pressures have played themselves out within very different sets of political institutions. At the same time, both the Netherlands and Britain have experienced fiscal pressures and related pressures to improve the efficiency and effectiveness of public services. In both countries, there has been growing official attention to reforming public services in order to improve performance and the adoption of ‘neo-liberal’ reforms in public policy generally. Within the realm of policing, this has resulted in growing pressure for the police in both countries to participate in broader partnerships or ‘security networks’ (Crawford 1997, Terpstra 2008), that may involve a range of other agencies including the commercial security sector.

**Understanding difference: the importance of political context**

Whilst there are many important similarities in broad trends between the Netherlands and England & Wales, many important contrasts remain between the extent and nature of plural policing developments in each jurisdiction. Such differences can
be related to contrasts in political institutions, historical traditions and cultural configurations that simultaneously resist, rework and mediate the broader and deeper social shifts referred to above. The contrasts between the political institutions of the UK and the Netherlands are surely crucial in this regard.

The UK is a common law country, with a ‘first past the post’ electoral system that has, for the majority of the last century or so, been dominated by two parties. The political system is designed to produce strong government, such that small swings in aggregate voter preferences can lead to major changes in government majorities. Coalition government is rare and political party discipline is strong. This results in an extremely strong hand for the executive, such that one distinguished political commentator referred to the UK as an ‘elective dictatorship’ (Hogg 1976). The office of UK Prime Minister has during recent decades accrued increasing de facto powers, with the resultant emergence of debates about the shift away from ‘cabinet government’ and towards ‘prime ministerial government’. The more presidential styles of two of the most dominant prime ministers in post-1945 history – Margaret Thatcher and Tony Blair – have underlined and entrenched such trends. This is not to say that there are no checks and balances in the UK policy-making system, including lobbying by special interests and pressure groups, and policy-making blockages and delays. But compared to some continental European political systems, this system is more likely to produce clear governmental programmes between which the electorate can choose, and which the electorate can do little to resist in between elections. This distinctive set of political institutions and cultures makes its mark on criminal justice and penal policy making. For example, it has formed a set of powerful countervailing forces that have worked to resist attempts at policy transfer from the USA, as well as being the framework for the development of distinctively ‘British’ policies within the sphere of crime control (Jones and Newburn 2007).

The ‘politics of policing’ in the UK also reflect these institutions and traditions. Most crucially for our purposes here, although policing has been described as the ‘last unreformed public service’ (Webster 2006), the police reform programmes of both Conservative and Labour governments have gathered pace and bite in recent years, resulting in some highly significant changes to policing in the UK. Ironically, the police service in Britain has traditionally held a position of considerable policy-making autonomy when compared to the police in many other democratic countries, including the Netherlands. The doctrine of ‘constabulary independence’ has provided legal and constitutional support for preventing the control of policing by local politicians (Jones 2008). The Association of Chief Police Officers (ACPO) has become a highly effective policy making and lobbying body, and on more than one occasion during recent decades has intervened in national policy debates to water down radical reform proposals for policing (Savage 2007). Nevertheless, policing has become increasingly responsive to, and shaped by, the requirements of central government. Despite the ongoing criticisms of some politicians, significant reforms have been implemented. With regard to the pluralisation of policing, ACPO has been a key partner in promoting some aspects of change, often in the face of opposition from the professional association of the lower ranking officers, the Police Federation. Key examples of this include the active promotion by leading chief constables of the idea of police auxiliaries in the form of PCSOs (Blair 1998), and ACPO’s incorporation into the development of the national performance framework.
Although similar in some ways to the UK, the Dutch political system comprises a starkly contrasting set of political institutions, shaped by a distinctive democratic tradition and political culture. This has crucial implications for the politics of policing in the Netherlands, and in our view is the prime explanation for some of the key differences between Dutch and British policing that were outlined above. Historically, one of the most remarkable features about Dutch democracy is the degree to which political stability and economic prosperity was achieved in the face of fundamental religious, political and economic cleavages. In stark contrast to the horizontal divisions based on class differences that were the main source of political allegiance in British society, social ‘pillarisation’ was a vertical pluralism based on four distinct ideologies; a liberal pillar of middle-class secular citizens, pillars incorporating the Protestant and Catholic communities, respectively, and finally a Social Democratic pillar incorporating the labour movement. One of the best known contributions to the debate about pillarisation and its effects came with the publication of Lijphart’s *Politics of Accommodation* in 1968. Lijphart (1968) argued that rather than be a source of instability, pillarisation was the key development that helped Dutch society remain relatively stable in the face of these fundamental social divisions. He developed his theory of ‘consociational democracy’ which argued that social segmentation need not be balanced by cross-cutting cleavages at the mass level in order to achieve political stability, as in standard ‘pluralist’ theories of democracy. Social divisions can be offset by the existence of accommodation, cooperation and compromise at the elite levels, realised by a distinctive set of political institutions and cultural traditions. Dutch society, in summary, was for many decades organised on principles of separate but equal development – characterised by Bax (1990) as ‘living apart together’.

A resulting distinctive feature of this system has been the tendency towards ‘non-decision making’ in the case of controversial or divisive issues. This is achieved by the appointment of an expert commission to deal with particular issues, which can take the political sting out of divisive matters by removing their discussion to the technical sphere. In a later edition of his book, Lijphart noted a process of ‘de-pillarisation’ had developed in the Netherlands, with the autonomous pillars described above beginning to crumble during the 1960s. Society became increasingly secular, electoral behaviour became more volatile, many new non-pillarised organisations emerged, and there was less cohesiveness within the existing pillars (Lijphart 1975). Such processes of de-pillarisation have had major consequences for Dutch society, and in particular have been associated with a major decline in sources of informal social control, and increasing levels of crime and disorder. Nevertheless, even though recent years have seen major changes in the politics of crime and policing in the Netherlands (Pakes 2005), it remains the case that many of the institutional features that emerged during the period of pillarisation remain. Thus, although discourse and rhetoric surrounding crime and policing have become increasingly punitive, at the level of practice, the former approaches of ‘social crime prevention’ persist in many areas (van Swaanningen 2005, p. 296). This is not to argue that important shifts in policy and practice have not occurred in the Netherlands. Rather, it is to observe that the new politics of crime is being played out within a set of political institutions and approaches that were formulated in a very different era. In policing and community safety, this results in a complex and contested mix of the new punitiveness and the more socially based preventive interventions that
dominated previous approaches. Once again, though popular pressures have arguably come to influence the policy processes far more than in the past, Dutch political institutions remain comparatively insulated from these, at least in comparison to the UK and the USA. These institutions include an electoral system characterised by a strong form of proportional representation that ensures even the smallest parties can obtain some political representation, and almost guarantees the need for coalition government. Despite the appearance of a more adversarial style of politics from the 1980s onwards, and some attempts at institutional reforms to introduce more direct forms of democracy – e.g., direct elections of the prime minister or of burgomasters – no such changes have been realised. Even the populist movement of Pim Fortuyn, although threatening for a time to bring about radical changes in the way that Dutch politics is conducted, ultimately collapsed and failed to shatter completely the politics of accommodation and compromise. Thus, while paying due regard to the importance of recent shifts in penal politics (and the politics of policing), it remains the case that ‘the Netherlands remains a country of minorities, which entertain no hope of becoming majorities’ (Andeweg and Irwin 1993, p. 49).

It could be argued that many of the important contrasts between policing pluralisation in England & Wales and in the Netherlands can be linked to the different political institutions, cultures and traditions of both countries (Jones 1995). With particular reference to the Netherlands, the system itself is much more weighted against the introduction of radical change and reform. Particularly when it comes to ‘market-based’ reforms to policing, the less marked developments in the Netherlands may reflect a more deep-seated suspicion of devolving core governmental powers to commercial corporations than that exists in the UK. The private security industry has always been subject to much more regulation than its counterpart in more laissez-faire Britain, and there is much more political controversy surrounding the incursion of commercial security operatives into the traditional public sphere of residential streets and parks. The same issue applies to reforms that allow the police to sell their services to private buyers. This reflects a different political conception of the state as the unambiguous controller of the public sphere, and a degree of caution about allowing profit-making companies to deliver what are still viewed as quintessentially ‘public’ services. Although privatisation has certainly occurred in the Netherlands, it remains a significantly more ‘welfare-oriented’ society, with higher levels of public spending as a proportion of Gross Domestic Product (GDP), and much less in the way of contracting out of local government services. In terms of pluralisation, whilst some aspects of these wider shifts are visible in the Netherlands, the distinctive political culture and institutional framework have moderated their extent, when compared with developments in England & Wales.

Conclusions

This paper has explored the ideas of policy convergence and divergence with respect to the development of plural policing in England & Wales and the Netherlands. It has demonstrated that there is evidence of both strong similarities and persistent differences between policing in each jurisdiction. A fully rounded explanation of what is happening to policing in western societies requires detailed exploration and
understanding of both similarity and difference. The recent history of Dutch and British policing presents a picture of 'convergent divergence'. At a broad level of generalisation, similar themes can be detected and linked with the broader shifts associated with 'cultures of control'. And yet, important differences in the 'empirical particulars' of different jurisdictions also require documentation and explanation. Similarities in developments of plural policing in the Netherlands and in the UK – despite the strongly contrasting political contexts – do suggest that deeper and broader structural and cultural forces are exerting similar pressures on western policing systems. However, the important contrasts between jurisdictions also suggest that the power of these forces is mediated, at least partly and at least for a time, by the impact of distinctive political institutions and cultures. These work as a buffer to radical change and transformation, such that although the effects of wider global forces are visible, these are re-worked within specific national and local political contexts. Within the study of penal policy convergence and divergence, some studies that have focussed upon the former have been criticised as having a deterministic flavour in that they imply that policy is headed, almost inevitably, in a particular direction which is impossible to resist (Zedner 2003). In the same way, we would question the conclusion that pluralisation signifies a fundamental and irresistible transformation of policing that will inevitably result in all countries converging in similar ways. The persistence of difference reminds us that the local 'politics of policing' still matters a great deal.

Notes
1. There are, of course, important differences between the structure and organisation of policing in Scotland and Northern Ireland, as compared with England & Wales (Walker 2000). For space purposes, however, the UK element of this paper will focus upon policing in England & Wales.
2. The focus here is on manned guarding services which represent, by far, the largest segment of private security operations. However, if other sectors of the commercial security industry – such as private investigation and the provision of mechanical and electronic security equipment – are included, the expansion of commercial security has been even more pronounced.
3. Indeed, there is considerable evidence that this development constitutes an example of 'policy learning' in which policy makers in the UK actively emulated developments in the Netherlands in this regard (Savage 2007).
4. There are some limited examples of informal private sponsoring of public policing in the Netherlands. For example, there is evidence that a large shopping centre contributes funds to support auxiliary police patrollers to patrol within its spatial boundaries.

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