

Social Justice and Regeneration Committee

Report

November 2005

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Social Justice and Regeneration Committee

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CHAPTER 1

INTRODUCTION

In September 2005, the Home Secretary, Charles Clarke, wrote to the Assembly Minister for Social Justice and Regeneration to inform her that the Westminster Government intended to endorse the findings of the report by Denis O'Connor CBE, QPM of Her Majesty's Inspectorate of Constabulary (HMIC), *Closing the Gap* - a review of the "fitness for purpose" of the current structure of policing in England and Wales was published by HM Constabulary on 16 September 2005 and can be found at:

<http://inspectors.homeoffice.gov.uk/hmic/docs/docs/closinggap.pdf>. The Home Secretary invited the Assembly's views on the findings of the report. A copy of the Home Secretary's letter to Chief Constables and Police Authorities is at Annex 1.

The Minister subsequently asked the Social Justice and Regeneration Committee to undertake a review on the report's findings, taking evidence and considering different ways in which the aims of the Home Secretary to "close the gap" in Level 2 policing (ie: policing to deal with cross-border issues, organised criminality, major incidents and events) might be achieved in Wales.

The Committee at its meeting on 28 September 2005 agreed the following terms of reference for the review:

To take evidence from interested parties, and to prepare a Report, following the Home Secretary's decision to endorse the conclusions and the recommendations contained in the report, *Closing the Gap*, on police force structures in England and Wales. To consider, in particular, the context of any future structural arrangements for police services in Wales:

- i. the relationship between the police and the communities they serve in Wales, and matters of local identity,
- ii. the impact upon any change on membership of Community Safety Partnerships and other partnership arrangements,
- iii. the relationship between the police and those services which fall directly within the responsibility of the Welsh Assembly Government

1.1 *Closing the Gap* report

The Home Office commissioned the *Closing the Gap* report. It followed on from an initial HMIC report that identified a 'gap' in policing at Level 2.

The report pointed to a future policing environment characterised by:

- Widespread enterprising organised criminality, proliferating international terrorism and domestic extremism.
- A premium on intelligence, expertise and smart use of capacity.
- An increasingly risk concerned public and intrusive media.

Looking ahead the police service needs not only to deal effectively with volume crime, the current performance focus, but also be ready to tackle complex, volatile threats to individuals, neighbourhoods and businesses. This implies a major development in capability and to achieve this, changes must be made not only to the structure, but the whole configuration of policing at this level.

The report referred to the concept of 'protective services'. This is derived from the idea that the police **protect the public** at a force, regional and international level, for example by dealing with serious and organised crime. This is in contrast to local policing where the police work **with the public** at neighbourhood level to tackle anti-social behaviour, or where they work **for the public** in dealing with volume crimes (eg: car crime, domestic burglary).

The 3 levels of policing are:

Level 1: Local issues – usually crime, criminals, anti-social behaviour – managed at a Basic Command Unit (BCU) level.

Level 2: Cross-border issues, organised criminality, major incidents and events.

Level 3: Serious and organised criminality, terrorism or other extremist activity at a national or international level.

The seven Level 2 protective services specifically examined in the report are:

- ◆ Major crime (homicide)
- ◆ Serious, organised and cross-border crime
- ◆ Counter terrorism and extremism
- ◆ Civil contingencies
- ◆ Critical incidents
- ◆ Public order
- ◆ Strategic roads policing

The report analysed the relative vulnerability to Level 2 issues of each Force to gauge their fitness to respond. It also considered the economics of protective services and examined a number of options for change to deal with the outcome of the analysis, which is that the present structure of 43 forces across England and Wales is no longer 'fit for purpose'. The report assumed that the status quo will not enable significant improvements that yield consistent delivery of protective services to national standard.

It concluded that there is a significant correlation between force size and ability to deliver Level 2 policing to the required standard. Forces with over 4,000 police officers, or 6,000 staff, tended to meet the standard across the seven protective services measured. Forces below that size tended to fall somewhat short of the standard with, in general, the smaller forces faring the least well.

The report also concluded that BCUs should be the critical building blocks of any possible new arrangement. This is because they deliver the bulk of everyday Level 1 policing and are mostly co-terminous with local authority and other partner boundaries, but are sufficiently large to deliver.

1.2 Home Office letter: 22 September 2005

A letter from the Home Secretary was sent to all Chief Police Officers and Chairs of Police Authorities in England and Wales on 22 September 2005 (Annex 1). It set out the process to be followed between the date of the letter and the end of December 2005 to develop options for force restructuring. Forces and Authorities were expected to establish review teams by the end of September and to report to the Home Office by the end of October, setting out a shortlist of options against the specified national criteria drawn from the *Closing the Gap* report, for examination in a further phase during November. A final report on each short-listed option, including a full cost-benefit analysis and a preferred option, is expected to be submitted to the Home Secretary by 23 December 2005.

The criteria to be used were:

Size – minimum size of over 4,000 police officers, or 6,000 total staff

Mix of capability and reduced risk – the capability of different partners both in dealing with volume crime and protective services

Criminal markets – an understanding of underlying criminal markets

Geography – underlying criminal markets and patterns of cross-border criminality

Co-terminosity –established political and partners boundaries. Any proposals should not subdivide an existing force area or cross a government office regional boundary (unless there are compelling arguments for doing so)

Identity –building on historical and regional identities

Clarity of command and control and accountability – clear and unambiguous governance arrangements

Performance – minimising risks during a transitional period and improvements in the medium term

1.3 Plenary statement: 28 September 2005

The Minister for Social Justice and Regeneration made a statement on 28 September 2005 on the HMIC report and the letter she had received from the Home Secretary (Annex 2). She announced that she had asked the Social Justice and Regeneration Committee to undertake a review of the restructuring proposals and that the Committee had agreed. The Transcript from a further Ministerial Statement on 15 November 2005 is also attached

1.4 Outline Business Case prepared by the four Welsh Police Authorities and forces: October 2005

The project team set up by the four Police Authorities and Forces in Wales prepared an initial paper appraising the options for change in service structure/delivery. This paper was submitted to the Home Secretary at the end of October to meet the timetable set out in his original letter (Annex 3). The paper identified four options for change:

- ◆ The existing four Forces (with greater collaboration to meet the Level 2 policing requirements)
- ◆ Two Forces (South Wales/Gwent and Dyfed Powys/North Wales)
- ◆ One strategic Force for Wales
- ◆ A North Wales Force with formal partnership links with the Cheshire Force

The four options were assessed against the national criteria specified in the Home Secretary's letter of 22 September.

These options are described in more detail in Chapter 2.

1.5 Home Office Police Structures Review Unit letter: 9 November 2005

The Director of the Police Structures Review Unit at the Home Office wrote to the leader of the Welsh Authorities and Forces project team on 9 November, responding to the Outline Business Case paper (Annex 4). The letter makes it clear that the response reflected the views of the Home Secretary.

The letter stated that there are some options that the Unit does not feel able to assess as suitable for further development.

The options assessed as not suitable for progression identified were:

- ◆ Four forces
- ◆ Two forces
- ◆ North Wales to stand alone with greater collaboration with Cheshire

The Unit considered that based on the evidence presented and the assessment it had undertaken, these options were unlikely to be recommended to the Home Secretary in December, unless further evidence to allay concerns was forthcoming. The letter also stated that it is ultimately a matter for the Police Authorities to determine which options should be proposed in December.

Details of the current Police Force structure in Wales is at Annex 5.

CHAPTER 2

THE WELSH DIMENSION

Chapter 1 of this report outlines the background to the Committee's review. This chapter details the responses received as a result of the written consultation exercise and the evidence received in oral sessions.

The Committee received 33 responses in writing and oral evidence from a further 10 sources. Details of all the evidence received are given in Annexes 6 – 8.

The concerns expressed may be grouped under the following headings:

- Consultation – why the haste? Not enough time has been given to consider the options.
- The Options for Change
- Finance – How much will restructuring cost and who will pay?
- Neighbourhood Policing – will restructuring and increased emphasis on Level 2 policing be to the detriment of community policing?
- Accountability – what will be the arrangements for ensuring the restructured forces are answerable to those who pay the bills?
- Job protection in a restructured service.

2.1 The Consultation and Welsh Context

The responsibility for the police service in Wales is not a devolved matter, therefore the Committee has no remit to affect the timescale for either the consultation or the implementation of any ensuing reorganisation. However many of those who produced evidence commented on the restricted timescale given for consultation. Some would rather have been granted more time to engage in a wider consultation of the stakeholders and the general public, but accept the restrictions that have been imposed. Others suggested that, as many parties both within and outside the Assembly can envisage the day that police services are devolved, that the process should be accelerated and the future structure of the Welsh Police Forces postponed until the devolution issue is resolved. A third view that has been expressed is that the whole question of the future structure of the police services in England and Wales is so fundamental to the governance of the two countries that it should be the subject of investigation by a Royal Commission. This is the view expressed by the Police Federation of Wales.

The geography, history and culture of Wales is different from that of England. Due regard has to be given to the political environment, not least the role and interest of the Welsh Assembly. The concern with delivery may well be the same, but whatever structure eventually emerges from the reorganisation exercise, the importance of Wales being considered as a nation not just another region must be recognised.

However it must also be recognised that within Wales there are regional differences. The North Wales Force has strong links with the North West of England in terms of transport links, movement of people and of course criminality. Similar links exist in South Wales with the South West of England.

North-South transport communication links in Wales are poor. This tends to accentuate differences rather than cement similarities. It is not surprising therefore that some local authorities, specifically Denbighshire County Council, Ynys Mon County Council and Wrexham County Borough Council are in favour of maintaining the North Wales Force. In doing so they are supported by the North Wales Fire and Rescue Service. The pros and cons of the various options are dealt with below.

A final consideration under this heading is the Welsh Language. Each of the Welsh Forces is subject to the Welsh Language Act. This would make any formal link with an English Force difficult. The Welsh Language Board warns against the dilution of any of the existing schemes established under the statutory requirements of the Welsh Language Act 1993. In terms of community policing the importance of the local community police officer being able to communicate with the people they are going to be serving in their first language is critical.

2.2 The Options for Change

The *Closing the Gap* report identified the need to address the shortfall in the provision of Level 2 services as a matter of urgency. As a result of the invitation from the Home Secretary to Police Authorities and Chief Constables, the Welsh Forces submitted four options which they considered would meet the Home Office requirement to bridge the shortfall in Level 2 policing in Wales. These are:

- **OPTION 1** – No Change, but each Force having to address the Protective Services gap and deliver Neighbourhood policing

Pros

- ◆ Existing Forces operate well
- ◆ Local accountability would be maintained
- ◆ Local Forces are sensitive to the needs of local communities
- ◆ Existing Authorities' response to Level 2 crime could be met by increased collaboration with nearby police authorities
- ◆ Accessibility and accountability of senior officers
- ◆ Maintenance of existing regions in Wales

Cons

- ◆ None of the Forces meets the Home Office minimum criteria for Level 2 Protective Services

- ◆ The Business Case for the no change option indicates it is not cost free. It has the highest annual recurring costs of any of the 3 options
 - ◆ The Police Authorities' views are that although all four Forces have historically delivered in terms of efficiency plans, continued achievement is not sustainable without a greater degree of collaboration, particularly in terms of back room functions.
 - ◆ Wales has a good record in terms of collaboration across many areas but the current legislative framework and different IT systems tend to mitigate against such arrangements on a large scale
 - ◆ Will leave little scope for rationalisation of existing services
 - ◆ Command and control arrangements will be blurred
- **OPTION 2**– Two Forces: South Wales / Gwent and North Wales / Dyfed Powys

Pros

- ◆ Enables Welsh Forces to deliver significant support function rationalisation
- ◆ Recognises a “regional“ structure in Wales
- ◆ Both capacity and capability would be improved
- ◆ One of the Welsh Forces would meet the minimum standard for capacity (although the other Force falls short)
- ◆ Intelligence functions would be improved by moving from four Forces to two
- ◆ South Wales / Gwent would be more able to undertake prevention activity than North Wales/Dyfed-Powys
- ◆ Opportunities for maximising economies of scale and efficiency savings would be available
- ◆ Dyfed / Powys and North Wales share linguistic and some cultural links
- ◆ Force boundaries would be fewer and would provide a clearer governance structure

Cons

- ◆ Only one of the Forces would meet the strategic Force concept
- ◆ Little opportunity for the Dyfed Powys / North Wales Force to undertake prevention activity
- ◆ Exchange and integration issues between the two Forces would remain
- ◆ According to the Police Authority statement, with a net present value of £679.1 million over 15 years, this is the most costly option for change in the long term

- **OPTION 3** – One Strategic Force for Wales

Pros

- ◆ Offers the greatest potential for significant savings in terms of delivery of Protective Services, Support Function Rationalisation and savings on Supplies and Services, Premises and Transport costs
- ◆ Offers the most financially viable platform from which Protective Services and improved efficiencies can be delivered
- ◆ Provide a national police service for the Wales with a clear, unambiguous national identity
- ◆ Would enable a significant increase in capacity and meets the Home Office criteria of a strategic Force with “future proof” resources mapped to demand
- ◆ Intelligence function would be significantly improved
- ◆ Provide for clear governance and accountability at all levels
- ◆ The option scores significantly higher than the other options on most levels
- ◆ The reorganisation of the Ambulance service proves a useful example of how a service run on an all-Wales level can be successful

Cons

- ◆ The geography of Wales will be an issue
- ◆ The cost and level of disruption will be significant in the short term
- ◆ The existing Forces will lose their identity
- ◆ The North Wales factor

2.3 Responses to the Options presented

The Police Authorities, Chief Constables and Welsh Local Government Association (WLGA) supported all three options without expressing a preference. A fourth option was also presented by the Chair of the North Wales Police Authority which suggested that more formal links with Cheshire and other North West England Forces may be another alternative. The Police Chiefs regarded this as being a variation on the “no change “ option which relied on partnership agreements to satisfy the protective services remit. Members of the Committee are aware that the North Wales option was submitted to the Home Secretary for consideration. They are however unable to provide any comment, as full details of the proposal have not been made available to them.

Many of the North Wales bodies wanted to retain a separate Force for the area. Concerns were expressed on weaker local accountability and the impact on other local public services that have been reorganised to bring accountability closer to the people.

Stakeholders, such as the Ambulance Service, Fire and Rescue Service and the Probation Service, stress the view that, whatever the final outcome, the necessity to retain the current links from basic command level up through the management chain are essential. The Fire and Rescue Service, particularly that for North Wales whose boundaries are co-terminous with those of the North Wales Police Authority, are in favour of that structure being maintained. They do not believe

their own existing boundaries should be changed, irrespective of the result of the Police review. All agreed that local delivery and partnership work was essential.

This was reiterated by the evidence received from various Community Safety Partnerships and the Police Federation. They emphasised the need to ensure that any restructuring solutions must provide added value.

No organisation expressed a preference for the “two Force” option. The status quo with increased collaboration between Forces and the single Force option were the most popular

2.4 Finance

The outline business case paper submitted by the four Police Authorities and Forces identified the costs and efficiencies attributable to the first three options submitted to the Home Office. These are set out below:

In all three options it has been assumed that there would need to be substantial investment in Level 2 Protective Services and in delivering Neighbourhood policing commitments that have already been agreed. The costings in the paper also assume that one-off set up funding is forthcoming from the centre.

Four Forces

Set up costs are estimated to be £7.8 million and the total annual cost are estimated to be £57.9 million. It has the highest annual recurring cost of any of the options.

The paper notes that with this option no Welsh Force meets the required national standards for protective services across the seven of the services assessed in *Closing the Gap* and that Force boundaries inhibit a logical response to tackling Level 2 criminality.

Two Forces

Set up costs are estimated to be £6.2 million and the total annual costs are estimated to be £56.4 million. Over a 15-year period this is estimated to be the most costly option, as there would be the costs of reorganisation without the full benefits of economies of scale.

The paper notes that with this option only one of the two Forces would meet the minimum capacity criteria. The other Force would fail to meet the required national standards for protective services across all seven of the services assessed in *Closing the Gap*. It would however be an improvement on the current situation.

One Force

Set up costs are estimated to be £12.2 million and the total annual costs are estimated to be £47.2 million. The paper says that this option offers the most financially viable platform from which protective services and improved efficiencies can be delivered. However the costs and level of disruption are substantial in the short term.

The paper notes that this option ensures Wales meets the criteria of a strategic Force that meets the required national standards for protective services.

Costings for the fourth option (North Wales to stand alone with greater collaboration with Cheshire) were not provided in the paper.

The evidence produced by the Chairs of Police Authorities, and confirmed by the Chief Police Officers, suggested that the cost of any reorganisation to allow Welsh Police Forces to provide the requisite service at Level 2 Protective Services and increased neighbourhood policing would be between £47 million and £57 million. This is despite the expectation that savings would accrue in later years. It was accepted that this might even be an underestimate. The uncertainty of how these costs are to be met concerned Members, the Police and Local Authorities. According to the Police Authorities, if these costs were to be met from local sources, the effect would be a substantial increase in council tax charges. The alternative is for the additional costs to be met centrally, by the Home Office.

The level of Police precepts was also discussed. Currently the levels vary between the four Forces in Wales. Those of the North Wales Police Authority are highest, at £159 per annum, and the lowest, South Wales Police, at £120. Dyfed Powys and Gwent are within this range at £143 and £145 respectively. The average precept for Wales is £138 per annum. An all Wales Force would presumably lead to a levelling of precepts throughout the country, leading to the possibility of increased council tax in the South Wales area, and possible reductions for North Wales council tax payers.

2.5 Neighbourhood Policing

There is basic consensus amongst all those who responded to the consultation that the Basic Command Units (BCUs) are the critical building block of the current structure and must continue to be so under any future structure. The Wales Association of Community Safety Officers (WACSO) and individual Community Safety Partnerships, the WLGA and individual authorities emphasised the need for the current focus being given to Neighbourhood Policing to be strengthened. It was pointed out that irrespective of what the final overall structure looks like, local communities are far more concerned about low level crime and anti-social behaviour. There seems to be consensus that, at local

level, it is important for the police structure to continue to mirror local authority areas to maintain the collaboration between and across Crime Safety Partnerships.

Neighbourhood policing is recognised as the foundation of the success of police operations in the four Welsh Forces. Local structures and partnerships are in place to deliver a service that needs to be enhanced and developed. Concerns have however been raised about a seeming trend to replace patrolling police officers with non-attested staff and Community Support Officers (CSO). Suggestions have been made that the CSO role should be evaluated. It has been stated that even across Wales, CSOs have different roles, powers, training and rates of remuneration.

2.6 Level 2 Protective Services

The *Closing the Gap* report identifies Level 2 policing as that required to deal with cross-border issues - usually arising from organised criminality, major incidents and events affecting more than one BCU and potentially across boundaries into neighbouring Forces. This can also include issues of wider public disquiet.

The report concludes that although the existing structure allows Forces in general to perform well in terms of Level 1 policing, and a national body had been created to deal with Level 3, question marks are raised over their capacity to deliver protective services of the Level 2 variety - the ability to cope with organised criminality and cross border issues of the "Soham" type investigations.

No one seems to disagree with this assessment. Additional evidence was presented by Gwenda Thomas AM, suggesting that some children have been placed at extra risk due to the incompatible policies between current Forces. She expressed concern about children who find themselves "within the system" being "lost" because of inadequate cross boundary co-operation both between police forces and social services.

2.7 Local Accountability

Concern was expressed from a number of respondents that with a restructured police Force in Wales, local accountability would be diminished. Denbighshire County Council, Newport City Council, Ynys Mon County Council and the WLGA all stressed the need for accountable arrangements to be in place at the various command levels within the determined structure.

2.8 Protection Against Job Losses

The Chief Constables suggested that any savings, which would arise from a restructuring exercise, would be found in the rationalisation of "back office"

services. This would result in job cuts largely amongst police staff. Members of the Committee were not provided with information on the likely numbers involved. UNISON representatives suggested that the restructuring of the police Forces could provide an opportunity for the development of police staff. At the moment, people stay within the same roles within the police Force with no promotion or development prospects. It was suggested that work should be done on creating development opportunities for police staff.

CHAPTER 3

CONCLUSIONS AND RECOMMENDATIONS

3.1 The Social Justice and Regeneration Committee accepts that there is a gap in Level 2 policing. However, for reasons surrounding the consultative process and differences in views on the prepared options, it is both unable and unwilling to recommend preference for any of the four options put forward by the Police Authorities and Chief Constables in Wales.

In reaching , the Committee is unanimous in its concern about the timescale that had been imposed by the Home Secretary on the consultation exercise that stemmed from the *Closing the Gap* report. It allows little time for widespread consultation either within Wales or outside. The lack of sufficient time to consider a fundamental change for policing in England and Wales was a constant theme in the evidence provided to the Committee

The consultation exercise itself relied on the Report's conclusion that "Bigger is Better". This seems to be based on an assessment of performance indicators about which the committee was not given sufficient information to be able to either assess or challenge. In fact the *Closing the Gap* Report accepted that some smaller Forces do perform very well and some larger Forces less so. This admission is particularly relevant in the Welsh context where, the majority of the Committee believes, the Welsh Forces are shown to perform to a higher standard than their English counterparts.

Members of the Social Justice and Regeneration Committee also question the acceptance of the *Closing the Gap* report's recommendation that the minimum size for a police Force under the new structure is 4000 officers, or 6000 officers and staff. There is neither explanation nor justification for this figure. Different parameters would have led to different solutions and the Committee therefore questions the seemingly arbitrary nature of these figures.

Wales is different from England and English regions in its history, geography and culture. Almost all its population lies within the urban conurbations along the M4 and A55 corridors. They are separated by a vast expanse of rural hinterland with very different policing requirements. These geographical differences add weight to the argument that Wales is different, and that police Force structures appropriate for England, and English regions, cannot always be transferred across the border. Members of the Social Justice and Regeneration Committee of course acknowledge that criminal activity does not recognise national or regional boundaries and that cross border partnerships must reflect operational reality.

The consultation process was too narrow to take any of these points on board. The Home Secretary supported the *Closing the Gap* recommendation that strategic Forces should be established throughout England and Wales. His letter to Chief Constables and Police Authorities invited them to consider future policing structures within certain parameters. He indicated that existing boundaries should not be split, that the proposals should not cross Government Regional Office boundaries and that the probable solution is for a strategic Force with a minimum of 4000 officers, or 6000 officers/staff combined. Within Wales, the only option that would meet all three requirements is the single strategic Force.

Finally on the consultation itself, the Committee agreed there is a Welsh dimension that should be considered. Within the Social Justice and Regeneration Committee there is a majority view that responsibility for the Police Service in Wales, together with the necessary funding, should be devolved to the National Assembly. This would be in keeping with its responsibility in respect of the other Emergency Services, Fire and Rescue and Ambulance; its wider responsibilities for community safety and social justice and in recognition of the part played by local authorities in both the funding and management of police Forces. Some suggest that under arrangements where responsibility for the police service rests with the Home Office, and for the other emergency services with the National Assembly for Wales, there may be a danger that the ability of the three services to plan and have joint strategies is compromised.

By majority, the Social Justice and Regeneration Committee therefore recommends that, in responding to the Home Secretary's consultation exercise on the future of Police Forces in Wales, the Welsh Assembly Government:

- **Reiterates its concerns about the haste imposed in the consultation process**
- **Asks the Home Secretary to accept that there is a "Welsh Dimension" that means that solutions in England are not necessarily appropriate to Wales**
- **Requests that the Home Secretary takes the reorganisation of the police Forces in England and Wales as an opportunity to suggest to his Cabinet colleagues that the time is now appropriate to start consultations on the devolution of responsibility for the police service in Wales to the National Assembly for Wales**

Members of the Committee are concerned that consultations carried out on the future police structure in Wales should not be a meaningless exercise. They were able to reach a number of conclusions and make a number of recommendations that they believe would benefit future policing in Wales, whatever the structure. The Social Justice and Regeneration Committee concluded that in order to determine the future structure for the Police Force in Wales, primary consideration should be given to:

- the type of service that is required to serve the country in the future, and
- those parts of the current service that need protection and enhancement to ensure they are not damaged in the restructuring process.

In the process of receiving evidence, Members have identified the following areas of particular concern:

- Funding
- The maintenance and development of neighbourhood policing
- Local Accountability
- Level 2 Criminality
- Job Protection and Back Office Operations
- A structure fit for devolution

3.2 Funding

In providing evidence to the Committee, the Police Authorities and Chief Constables made the point that if the Home Secretary's vision to provide Level 2 Protective Services at the required level for all Police Forces in England and Wales is adopted, a no change option for Wales did not exist. Even if all four Forces were to remain, changes would be required to enable them to operate at the required level. The anticipated additional annual cost of the three options submitted by the Police Authorities is between £47 million and £57 million (including the costs associated with meeting the levels of increased neighbourhood policing already agreed). In addition there are additional set-up costs of between £6 million and £12 million. The view was expressed that even these estimates may be understated.

Members of the Committee are therefore concerned about how these additional costs are to be met. The Home Office calculations assume that the savings accrued from the rationalising of services will negate additional costs from year one. The evidence given to the Committee suggested this is over-optimistic and some suggestions were made that the resulting savings would take up to ten years to materialise.

The Committee are unanimous in their conclusions that any increased costs resulting from restructuring should not be met from either the National Assembly for Wales budget nor by Welsh tax-payers through increased police precepts.

The Social Justice and Regeneration Committee recommends that any increase in cost resulting from the restructuring of Police Forces in Wales should be met from additional resources provided directly by the Home Office.

3.3 The Maintenance and Development of Neighbourhood Policing

The one issue where there is total agreement from all those who provided evidence to the Committee is that whatever the outcome of any restructuring exercise, Basic Command Units (BCUs) **must** remain as the critical building blocks. The advantages of BCUs having secured co-terminosity with local political and partner boundaries is highlighted by a number of respondents. It is repeated by a number of witnesses that any move to a bigger or different structure must not affect the abilities of BCUs to deal with aspects of crime protection and prevention on a local basis. In particular the important role played by the 22 Community Safety Partnerships in Wales must be maintained.

The Committee found consensus in the belief that the focus given to Neighbourhood Policing needs to be strengthened as an essential element in the reassurance agenda. Evidence from a number of sources emphasised that, irrespective of the structure of the Police Service, local communities are more concerned about low level crime and anti-social behaviour.

The Social Justice and Regeneration Committee recommends that no resources should be detracted from the Basic Command Unit (BCU) to secure the aims of Level 2, or any other form of non-neighbourhood policing.

The Social Justice and Regeneration Committee recommends that the role played by the 22 Community Safety Partnerships in Wales is maintained.

3.4 Local Accountability

With any major change in Force structure both the Committee, and those who provided evidence, recognised that the issues of local profile and accountability need to be addressed. Related to this is the need to strengthen the role of the local elected members at Police Authority Level.

Suggestions have been made that if a Strategic Police Force were to be established for the whole of Wales the resultant Police Authority should be restricted to 10-12 Members. The Social Justice and Regeneration Committee would find this totally unacceptable. All local authorities, and through them local taxpayers, will be expected to contribute to the Police precept. All authorities should therefore be represented on any resultant Police Authority. Any other proposal would involve a form of taxation without representation.

A single Police Authority for Wales has also raised the spectre of whether there should be a structure between the BCU and the Chief Constable. Suggestions have been made for a Police Commissioner for Wales supported by three assistants, each responsible for a region which would replicate that covered by

the Fire Service in Wales. Such an arrangement would ensure co-terminosity with the other two emergency services. Local Boards would provide for local accountability.

A third suggestion is that boards at BCU level could be created to include Community Council representatives, ensuring local accountability at an even more grass-roots level.

The Committee noted these suggestions but without further information was not able to reach conclusions on what structure would eventually emerge. Members were however adamant that local accountability could not be ignored and that if an all Wales Force did emerge, that the Authority itself would include at least one member from each of the 22 Unitary Authorities in Wales.

The Social Justice and Regeneration Committee recommends that if an All Wales Strategic Force is created, that the Strategic Authority would include at least one member from each of the 22 Unitary Authorities in Wales

3.5 Level 2 Criminality

Most of the evidence submitted to the Committee, both oral and written, seemed to accept the need for Police Forces to be adequately resourced to deal with Level 2 serious crime. As already stated, there are disagreements (and support) with the recommendations relating to minimum Force size – but the basic requirements to accommodate Level 2 policing are accepted. However it must be repeated that any effective solution to solving Level 2 crime must at the same time give further resource and authority to the BCU.

The Committee concluded that in accordance with the parameters set by the Home Secretary, Level 2 protective services could be provided by a single Welsh Strategic Force. It also accepts that Police Authorities also suggested three other alternatives that they consider would meet the identified need. As already stated, the Committee has indicated no preference for any of these options. It has however noted the evidence from the Chief Constables that in the event of the single strategic Force option being favoured there is no operational reason for the headquarters of such a Force to be located in South Wales, or in fact that provision of all corporate services need be centralised at one location. Chief Constables pointed out that they were already examining the possibility of rationalising services on this basis. The Committee endorses this conclusion and believes that careful consideration should be given to the siting of the headquarters for a strategic Welsh Force in the north of Wales if such a Force is created

The Social Justice and Regeneration Committee recommends that if a Strategic Welsh Police Force is created, serious consideration should be

given to the siting of the headquarters of such a Force in the north of Wales.

3.6 Job Protection and Back Office Operations

The Committee notes that at 31 March 2005 there were 11,200 personnel employed by Police Authorities in Wales. Of these, 7,600 were Police Officers and 3,600 police staff. The police staff, in the main, are employed in what has been described as “back office” as opposed to “front line” operations. There is however evidence of co-operation where staff undertake duties at the local level such as fingerprinting and scene of crime officers (soco). The Committee would wish such local arrangements to continue, and in fact be expanded to release police officers to concentrate on duties involving public protection, reassurance and dealing with crime prevention and detection. The Committee endorses the expressed view that the restructuring of the police Force provides an opportunity to promote and enhance the work of police staff

Members of the Social Justice and Regeneration Committee would also encourage Police Authorities in Wales to adopt a policy of equity in the treatment of all its employees in the Police Service, officers and staff alike. Evidence has been received that this is not currently the case.

The Committee notes that the consensus view would seem to be that the savings that would accrue from any restructuring would be as a result of savings in back office operations. It concludes that any savings on the scales envisaged must involve reduction in staff numbers. It has received no estimate of what these numbers would be. It does however accept that the employment of retiring police officers on non-operational duties will aggravate the situation, and suggests that such practices should be reviewed. Suggestions have been made for a Statutory Staff Commission to be established which would deal with all staffing issues on an England and Wales basis. The Committee supports this idea, and believes that such a body could be mirrored in Wales to handle specific Welsh issues and as a precursor to eventual devolution of the Police Service to the National Assembly.

The Social Justice and Regeneration Committee recommends that a study be undertaken involving Police Authorities, Chief Constables and the respective Trade Unions/Staff Associations to identify a distinction between operational and non operational duties with a view to enhancing the job opportunities of police staff and releasing Police Officers to undertake prevention, detection and protection services.

The Social Justice and Regeneration Committee recommends that Police Authorities in Wales adopt a policy of equity in the terms and conditions of service of all its police employees

The Social Justice and Regeneration Committee recommends that a Statutory Staff Commission be established to deal with all police staffing issues arising from restructuring and that the arrangements are enhanced by establishing mirror arrangements for Wales.

3.7 A Structure for Devolution

Whatever the outcome of the restructuring process, the Committee believes that the structure that emerges must allow for the future devolution of responsibility for Police Services to the National Assembly for Wales. It cannot agree with any suggestion that the North Wales Police Force should combine with any Forces in the North West of England. Such amalgamation would be a barrier to further devolution as well as face almost insurmountable problems associated with complying with “Wales only” legislation and practices e.g. the Welsh Language Act, and Police precepts.

The Committee however does welcome the assurances that the current cross border service agreements (both formal and informal) that existing Forces have established with their English neighbours would remain and hopefully be built upon following the restructuring exercise.

The Committee also recognises that the desirability for devolution of the Police Services to the National Assembly for Wales must not be achieved at any price. When the function is devolved it must carry with it the understanding that transfer of functions also means transfer of resources. Such resources must include the existing operating costs as well as the full cost of restructuring as a result of the present exercise. Those restructuring costs must not be restricted to the set-up cost for the new organisation but also the recurring costs that would accrue over a number of years until the fully anticipated savings are realised.

The Social Justice and Regeneration Committee recommends that any restructuring of Police Forces in Wales that results from the *Closing the Gap* report should not be prejudicial against the future transfer of responsibility for Police Forces in Wales from the Home Secretary to the National Assembly for Wales.