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Dyddiad: Date: 3rd November 2005

Roger Chaffey
Clerk to Social Justice and Regeneration Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

Dear Mr Chaffey

RE: Consultation on Police Structures

Thank you for inviting the North Wales Criminal Justice Board to contribute to the Social Justice and Regeneration Committee's consultation on the implications of the current review of Police Structures.

The Board has considered the proposals and has also taken the opportunity to consult with our own Consultative Group Members. A number of potential implications for the delivery of Policing and Criminal Justice Services in North Wales have been identified in the light of the Government's stated preference for larger strategic forces which in Wales would translate to a single strategic force in Wales.

- ◆ **Geographic Implications;** A single Police Force for Wales would meet the capacity criteria identified in 'Closing the Gap' but the geographical size of Wales and North/South transport links could result in a transfer of resources from North to South leaving North Wales with a reduced operational capacity and the consequent risk of becoming a satellite to the South.
- ◆ **Criminal Markets;** North Wales has strong commercial and economic links with Cheshire and the North West and consequently the 'flow' of serious crime is historically influenced by criminal activity along the A55. Operational links between North Wales Criminal Justice Agencies and the north west are well established and would be adversely affected by a move to an All Wales Force which became South Wales orientated.
- ◆ **Coterminosity;** The principle of coterminosity has become the guiding principle of the Criminal Justice System and is one of its strengths. Considerable progress has been made in developing joined up strategic and operational approaches to improving the delivery of justice. An All Wales model would be too large to support the continued 'joined up' agenda to problem solving and BCU's would be too small for joining up the

key criminal justice agencies. The current 'sub regional' coterminous model which underpins local Criminal Justice Boards achieves the balance enabling strong leadership from Chief Officers translated into increasingly collaborative, joined up operational delivery.

- ◆ Identity; North Wales does have a distinct identity which is reflected in the presence of a lead sub regional newspaper (Daily Post) and operational presence of broadcast media (BBC/HTV Television and Radio). The cultural, economic and social differences between North and South Wales have been well documented over many years. The Welsh Assembly's Government's recognition of the need to establish a presence and base in North Wales is itself recognition of the importance of decentralised structures for government and public services.
- ◆ Economics; The desired outcome of the Police reforms is to maximise efficiency benefits to free up resources to improve protective services. At this stage there is inadequate supporting evidence (i.e. business model) to demonstrate how or if this can be achieved. The concern is that marginal 'back office' efficiencies would be achieved if a fully centralised model was implemented. In Wales some degree of sub regional decentralised support and back office infrastructure would be required. The risk of such 'local' support capacity being based on BCU's is a consequent longer term overall increase in support costs.

A further potential economic consequence of a single strategic force for Wales would follow if resource allocation at operational level was prioritised away from neighbourhood policing to level 2 priorities. This could have significant implications for North Wales communities where crime is reducing but local confidence in policing is linked to lower level anti social behaviour and visibility of the police.

- ◆ Administration of Justice; Historically the administration of Justice within the Crown Courts has been delivered within the Cheshire and Wales Circuit. There are no barrister chambers in North Wales and court business is conducted between Courts in Cheshire and North Wales. Legal representatives express disquiet about the potential risk to ensuring North Wales residents have access to high quality advocacy services.
- ◆ Governance; There are serious concerns within the Criminal Justice sector and our partners that the local dimension of governance for the police will be undermined by any move to an All Wales Strategic Police Force. There is strong support for governance arrangements continuing at a sub regional 'Area' level. A single strategic authority for Wales would reduce the ability to determine strategic priorities for the different Areas in Wales. Supporting a single strategic Authority with consultative or advisory panels at BCU level would not deliver the accountability framework which the current structures provide. There is therefore a significant risk of a governance and accountability deficit in the Government's preferred approach.
- ◆ Local Community Safety Links and Partnerships; North Wales has a track record of building effective partnership arrangements at local (Local Authority) and pan North Wales level (Chief Officer Strategic Community Safety Forum). It is critical that the

outcome of the proposed changes to police structures retains and supports such sub regional strategic leadership initiatives.

- ◆ Political Implications; There are clearly different political implications for Wales than exist in England. A single strategic Police Force Authority for Wales working collaboratively with the Welsh Assembly Government could be a critical stepping stone to devolved responsibility for policing (and other Criminal Justice Agencies). However the current drivers for change to deliver large strategic forces able to provide effective protective services creates a significant number of risks for communities in North Wales. Any such shift would need to demonstrate;
 - What real efficiency savings would be achieved given the need for decentralised budgets and some decentralised support functions.
 - How North Wales would be protected from a shift of resources to the more populated South.
 - What effective sub regional strategic structures would be put into place to bridge the gap from a central command structure and local BCU's.
 - What Governance arrangements would be created at the All Wales and sub regional/local level to avoid a governance/accountability deficit.
 - What flexibility would exist to enable collaboration on operational and technical/support services with the North West.

Conclusion

- ◆ The North Wales Police Authority have identified their priority as building on the strategic links with Cheshire and the North West. For the Criminal Justice Board and Criminal Justice community the overriding priority is ensuring any future structure retains business stability to provide strategic leadership and delivery of the justice across the North Wales area and an ability to retain business partnerships across the border with Cheshire. If the outcome of the restructuring is the creation of a single strategic Police Force for Wales the retention of a sub regional structure between the Wales Authority and Headquarters with local representation on a sub regional governance body would be an imperative.

Yours sincerely

Carol Moore
Chair – North Wales Criminal Justice Board