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Clerk – Social Justice and Regeneration Committee
National Assembly for Wales
Cardiff Bay
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Restructuring the Police

Dear Roger

Thank you for the invitation to submit a report to the Committee outlining our views as an organisation on the process of reviewing the structural arrangements for the police service in Wales. We hereby respond to your invitation by listing our comments below, which relate to the terms of reference noted in your letter. Most of our comments focus on the first point in those terms of reference. In our submissions we refer to relevant parts of the report 'Closing the Gap' by Her Majesty's Inspectorate of Constabularies, on the restructuring the police forces.

I wish to submit the following list of recommendations for consideration concerning the restructuring of the police forces in Wales:-

- **It should be ensured that the requirement to have a Welsh Language Scheme is included in any transitional arrangements**
- **Local policing in Wales should be understood to include policing in the language of choice of the individuals and communities served**
- **All factors should be considered which are likely to impinge on the Welsh-medium provision**
- **There should be representation for the language interest on any group which may be established to oversee the process**
- **The new structure for the police forces in Wales should ensure that forces in all parts of Wales can establish and operate procedures to monitor the standard of the Welsh-medium provision**
- **The future structure of the police forces should offer senior officers within the new organisations every possible opportunity to acquire an understanding of the Welsh language**
- **We strongly recommend that any change in the structure of the Welsh police forces should not impair the forces' ability to collaborate in order to increase their capacity for effective local Welsh-medium policing**
- **Agreement on necessary organisational improvements should form part of the restructuring, so that Welsh forces do not find it difficult to meet the statutory requirements in their Welsh Language Schemes because of the negative influence of associated organisations**

- Any restructuring should aim to strengthen the potential of partnerships to offer services which are suited to local society, including the provision of services in Welsh
- Any financial restructuring should be seen as an opportunity to improve local policing in Wales, by enabling forces to prioritise funding to meet local needs

The reasons for these recommendations are explained in the report below.

Background

In accordance with the Welsh Language Act 1993, preparing a Welsh language scheme is a statutory responsibility of every police force in Wales. These schemes state which services the police forces will provide in Welsh, and include specific targets for improving the provision. The police forces' Welsh Language Schemes are extremely important instruments for ensuring a high standard of local policing. Clause 1.7 of the Board' statutory guidance on the preparation of Welsh Language Schemes states:-

" . . . Welsh language schemes will need to set out the measures organisations propose to take in order to treat Welsh and English on a basis of equality whilst providing services to the public in Wales. This covers those activities which are carried out for the benefit of the public at large as well as for the benefit of an identifiable individual or individuals. The meaning includes supplier/customer relationships between organisations and the public, where services are provided directly to members of the public and individuals. It also includes, for example, the keeping of law and order . . . "

Whatever structure is agreed upon as a result of the current discussions, the resulting regime will be expected to operate a Welsh language scheme in order to meet the requirements. It should therefore be ensured that a requirement to have a Welsh Language Scheme is included in any transitional arrangements.

(i) The relationship between the police and the communities which they serve in Wales, and matters of local identity.

The report by Her Majesty's Inspectorate of Constabularies emphasises local policing. Clause 1.65 refers to the need for:-

"A force which is big enough to deliver protection, but still small enough to identify with local communities, is an attractive one. Re-configuring for better protection of, and connection with, the public, needs to be seen as part of a package of police reform for this century."

We agree that improving the connection with the public needs to be one of the chief considerations in planning to restructure the police forces. The opinion of the Board is that local policing in Wales should be understood to include policing in the language of choice of the individuals and communities served.

The statutory language scheme requirements state that the linguistic requirements should be considered whenever changes of policy occur, in order to move closer to the principle of ensuring equality of opportunity and to take advantage of all possible opportunities to increase the Welsh-medium provision. Police constables and other officers come into contact with local communities in a variety of situations: when visiting schools, visiting people in their homes, organising public meetings as well as

in other circumstances. These are examples only, but in regard to all of these situations, the impact of any new structure on the Welsh-medium provision needs to be assessed, and due consideration given to that provision.

In the event that the police forces are restructured, **all factors should be considered which are likely to impinge on the Welsh-medium provision**, in the course of deciding on and developing a package of measures to strengthen the bilingual provision.

The Board is strongly of the opinion that the only way to secure appropriate consideration for the language within the restructuring process, and subsequently in all aspects of the work of the future police forces, is through ensuring the **presence of a representative of the language interest on any group which may be established to oversee the process**. A representative with an understanding of the linguistic needs of the Welsh police forces could undertake the essential work of ensuring that any restructuring maintains and improves the standards of Welsh-medium policing in Wales. This would be in keeping with Clause 5.60 in the report of the Inspectorate, which proclaims the need to make assessments which take into consideration the demographic characteristics of the areas being served.

Key example 1

In establishing call centres, North Wales Police are currently collaborating with other agencies to create a centralised call centre in St Asaph for the provision of telephone services. Because of the linguistic nature of the area being served, a substantial number of appointments with in this centre have been designated 'Welsh-speaking essential'. The new structure should encourage similar opportunities to improve the Welsh-medium provision, in order to provide 'local' policing services of a suitable standard.

Key example 2

Clause 1.32 in the report of the Inspectorate states that people identify with

".....a discrete neighbourhood, wanting an identifiable, named local officer."

The new structure of the police forces should ensure due consideration for language in recruitment and training processes, in order to ensure that constables and other officers have appropriate language skills for successful local policing. 'An Garda Siochana', the police force of the Irish Republic has met with considerable success in implementing a policy which requires every new police officer to attain a specified level of proficiency in Irish within a set time. We believe the new structure should enable police forces in Wales to adopt similar best practice initiated by other forces, in order to enhance their capacity for effective local policing. There are examples of police forces in Wales which have invested considerable time and money in developing the Welsh language skills of their staff. The new structure should allow for the best use of investment in language skills by the police forces in Wales, in order to serve the communities effectively.

It would be advantageous if the new structure allowed for the implementation of a Welsh Language Scheme which sets common targets and a set timetable for improving the Welsh-medium provision throughout Wales. **The new structure for**

the police forces in Wales should ensure that forces in all parts of Wales can establish and operate procedures to monitor the standard of the Welsh-medium provision

Experience shows that those public bodies whose senior officers are more supportive of the language operate their language scheme measures more effectively than others. In the context of local policing, skilful leadership means leadership in matters which are important to local communities. In a number of areas in Wales this will include the ability to lead in linguistic matters and to speak Welsh. **We recommend therefore that the future structure of the police forces should offer senior officers within the new organisations every possible opportunity to acquire an understanding of the Welsh language.**

ii) The effect of any change on the membership of Community Safety Partnerships and other partnership arrangements

One of the criteria applied in the Inspectorate's report is 'co-terminosity', meaning the need to consider political and partnership boundaries. From the point of view of language, we can confirm that the Welsh police forces are already collaborating to improve the standards of the Welsh-medium provision. Senior officers from the Welsh police forces meet in the group WACPO which considers matters connected with the Welsh language. Clause 1.53 in the report, which focuses on the 'lead regional force' arrangement, refers to building on infrastructure, processes and partnership arrangements which already exist. **We strongly recommend that any change in the structure of the Welsh police forces should not impair the forces' ability to collaborate in order to increase their capacity for effective local Welsh-medium policing.**

The Inspectorate's report states that the strengths of the various 'partners' should be considered when restructuring. In Wales, there is considerable variation in the capacities of the police forces to provide Welsh-medium services. The North Wales Police force has developed very successful procedures for policing in the Welsh language. Within the 'lead force' structure, the other police forces in Wales could benefit from the good work done by North Wales Police, by adopting policies and procedures which are relevant to their 'local' circumstances. The Welsh language is, of course, an important part of communities through the length and breadth of Wales.

The report refers to the possible implications for associated organisations, resulting from any change. The police forces depend on associated organisations, which are located outside Wales, to provide a number of services. The incapacity of these bodies to provide services which are consistent with the forces' language schemes, is having the negative effect of impairing the ability of the Welsh forces to provide effective Welsh-medium policing. **Agreement on necessary organisational improvements should form part of the restructuring, so that Welsh forces do not find it difficult to meet the statutory requirements in their Welsh Language Schemes.**

Key example 3

The Home Office provides materials and guidance for police forces in Wales; the Police Information Technology Organisation (PITO) provides their software; Her Majesty's Inspectorate of Constabularies inspects the performance of the forces in Wales; while CENTREX administers their recruitment processes. So far, all these central bodies, while influencing the work of the police forces, have largely ignored the existence of the Welsh language. Consequently, there is no software available to facilitate the provision of Welsh-medium services; the Inspectorate does not monitor the standard of the Welsh-medium services which the forces provide; and the language is not considered when recruiting into the forces in Wales.

Because of the influence of these organisations, the ability of police forces in Wales to provide a high standard of 'local' service, reflecting the linguistic variability of communities in Wales, has been curtailed.

We therefore believe it is all-important, when considering the restructuring of police forces in Wales, to consider also the structure of bodies such as the ones listed above, which largely control the success of local policing in Wales.

Key example 4

The development of software to record details of individuals held in custody - The computer software 'NSPIS' was developed some years ago by the Police Information Technology Organisation, with finance provided by all the police forces in England and Wales, in order to record details of individuals held in custody and to prepare cases against individuals. Until very recently, the software which was developed did not permit Welsh forces to record the language of choice of individuals held in custody, or to prepare documents for court cases in Welsh. The new structure should aim to offer new opportunities for the police forces in Wales to ensure proper consideration is given to language in any new initiatives of this kind, which seriously affect their ability to offer equality of opportunity to the public in Wales.

- The police forces are collaborating closely with a number of criminal justice agencies, including the courts, the prisons, the probation service and the Crown Prosecution Service. Altering the structure of one of these agencies could have repercussions affecting the ability of other agencies to offer a range of Welsh-medium services of a high standard to the public in Wales. The report of the Inspectorate focuses to a considerable extent on the importance of developing local policing services (clause 1.7). It must be remembered that other criminal justice agencies offer services of a 'local' nature as well, often in co-operation with the police forces. An obvious example of this is the work of the Community Safety Partnerships. **Any possible restructuring should aim to strengthen the potential of partnerships to offer services which are suited to local society, including the provision of services in Welsh**

iii) the relationship between the police and those services which are the direct responsibility of the Welsh Assembly Government

Clause 1.46 in the report of the Inspectorate states that political and partnership boundaries are important considerations for the planning of the new structure. In the

opinion of the Board any new arrangement should respect the linguistic nature of Wales. We believe that any change in the structure of Welsh police forces should promote the objectives of the Welsh Assembly Government's Action Plan, 'Iaith Pawb', namely

"... to be a truly bilingual nation, by which we mean a country where people can choose to live their lives through the medium of either Welsh or English ..."

The new structure should allow Welsh police forces to continue to work to achieve the Iaith Pawb target of providing more Welsh-medium local policing:-

"... more services, by public, private and voluntary organisations are able to be delivered through the medium of Welsh. ..."

Only by choosing an option which allows the operation of Iaith Pawb targets will it be possible to ensure "... a human, accessible, accountable face on the imposing institution of policing" through the length and breadth of Wales (Clause 1.42).

In this context there is a need to consider the funding arrangements. Clause 10.18 in the report of the Inspectorate states

"...any move to a more strategic organisation of policing needs to take place in a carefully planned and measured way which reduces the short-term risks as far as possible and keeps a clear line of sight on the benefits to be realised."


The maps on pages 43 – 47 of the report of the Inspectorate show that the need for protective services is less in Wales than in certain other areas, because cases of activities which call for protective services are fewer. The funding arrangements for Welsh forces should therefore permit a higher proportion of resources to be allocated to the needs of local policing. As we have pointed out already, one of the constant and increasing local policing needs throughout Wales is the need to provide Welsh-medium services which correspond to the requirements of the increasing percentage of Welsh speakers in Wales. The value of retaining the present financing arrangements needs to be considered, for example, funding software development and recruitment centrally, when organisations like PITO and CENTREX pay no regard at all to the Welsh language. **Any financial restructuring should be seen as an opportunity to improve local policing in Wales, by enabling forces to prioritise funding to meet local needs**

To conclude, we believe that the decision to restructure the police forces offers an exceptional opportunity to improve the standard of policing in Wales. There are advantages and disadvantage associated with all of the options for restructuring which are listed in the report of the Inspectorate. What is important, from the linguistic point of view, is that change should be based on "... capacity building....." rather than the principle of saving money (Clause 1.34).

The Welsh-language provision cross Wales varies widely in respect of availability and quality. We hope that any structural change will create opportunities for improvement in the Welsh-medium provision, rather than set up obstacles to such improvement, and that it will lead to increased opportunities to use Welsh within policing in Wales.

We trust the points made in this report will be of assistance to you in your deliberations concerning the restructuring of the Welsh police forces. I thank you again for the opportunity to contribute to the discussion; if you wish to discuss the contents of this report further, you are most welcome to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "Meirion Prys Jones". The signature is written in a cursive, flowing style.

Meirion Prys Jones
(Chief Executive)