

ACK 2/11

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Eich cyf/Your ref
Ein cyf/Our ref IRM/KOW
Dyddiad/Date 25 October, 2005
Rhif union/Direct dial 01824 706128

Dear Roger,

**Social Justice and Regeneration Committee
Restructuring of Constabulary**

Thank you for your letter of 28 September.

I attach a copy of my Leader's recent letter to the Chair of North Wales Police Authority. This represents the provisional response that she has made on behalf of Denbighshire County Council. The full Council will be meeting on 22 November to finalise its comments, which falls after your deadline for submissions.

Yours,

Ian

**Ian Miller
Prif Weithredwr
Chief Executive**



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RWH/SEE
20th October, 2005
01824 706097

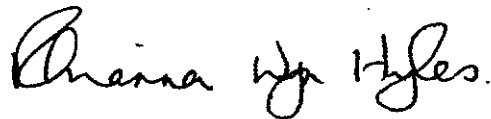
Dear Ian,

POLICE FORCE STRUCTURES

Thank you for your letter of 30 September. In the inadequate time that has been allowed by the Home Office for this very significant process, there has not been the opportunity to arrange for the County Council formally to consider its views. While I have consulted some key colleagues, it is intended that the full Council should consider the matter at its meeting on 22 November and therefore the enclosed comments have to be regarded as provisional.

I hope that you find them helpful. If you would welcome a discussion about this, please let my office know.

Yours sincerely,



Cynghorydd/Councillor Rhiannon Hughes MBE
Arweinydd / Leader



POLICE FORCE STRUCTURES

Provisional comments from Denbighshire County Council - October 2005

1. There has been inadequate time allowed by the Home Office for this major process, particularly in terms of seeking input from partner agencies and the general public.
2. There is concern that the "one size fits all" nature of the approach – that police forces should be above a stated minimum size – means that other factors have been overlooked such as accountability, local links, cultural issues and relationships with other statutory agencies.
3. For example, the suggested minimum size of 4,000 officers must, ultimately, be a subjective view. We suspect that there are some smaller forces that deliver some of the protective services satisfactorily or well, and equally there may be some larger forces that do not deliver a universally satisfactory or good service. And where is the clear evidence that a force of 3,900 or even 3,000 officers cannot deliver? If the Home Office's proposals are "right", why is the Scottish Executive not pursuing similar changes?
4. There does not seem to have been adequate exploration of all alternative solutions to creating a pattern of strategic police forces. For example, if it is accepted that some matters are best dealt with on a "national" basis such as major crime inquiries, civil contingencies, terrorism, etc. while other can best be handled locally, is another possible solution to move to a "national" police force while retaining a pattern of local police forces (which could be on an even more local footing than now)?

Retention of separate police force for North Wales

5. We perceive the following benefits of retaining the present North Wales Police force and authority:
 - there is a strong feeling of identity within North Wales, which the boundaries of the police force and authority reflect;
 - there are common boundaries with the North Wales Fire and Rescue Service, which promote collaboration and joint working. An example is the joint control room project which is being implemented;

- the chief constable, other senior officers and the police authority are accessible and accountable to local people : far more so than would be possible in a larger force;
 - North Wales is a sufficiently large geographical area already for policing purposes. Merging it within an even larger area would raise concerns, not just about remoteness and accountability but about whether resources and posts would be removed from North Wales and deployed elsewhere, with a consequent impact on performance in tackling crime and disorder and on the economy. This would be disappointing when four of the six counties are in the Objective 1 area;
 - such a merger would undermine again the status of North Wales as a region within Wales. This is not a trivial point when the capital and the seat of the Welsh Assembly Government are at the other end of the country;
 - merger with other areas would endanger the positive approach that North Wales Police takes on matters relating to Welsh culture and language;
 - it avoids need for changes to regions of the Criminal Justice Board and National Offender Management Service: the North Wales region has been established in only the last 12 months or so and has not had time to "bed down".
6. We recognise, however, that retention of the North Wales Police on its current footing does not meet many of the criteria that the Home Secretary has set. On the assumption that change will be required to meet them, we do not believe that lead authority or other collaborative approaches would be easy to negotiate and secure in the time that has been allowed. Our remaining comments therefore focus on options that would involve mergers with other forces.

Merger with Cheshire

7. We strongly oppose this option. It would not meet the criterion about staying within the boundaries of Government Offices for the Regions (although there is no such Office for Wales). There are also the following substantial practical objections:
- a cross-border force could not be accommodated within the separate local government finance systems for Wales and for England. Who would be responsible for capping its council tax precept, for example?

- a cross-border force would not be as likely to deal satisfactorily with the requirements of the Welsh Language Act as a force based solely in Wales;
- while we recognise the UK Government's position that it has no plans to devolve responsibility for policing in Wales to the National Assembly, a cross-border police force would make such a step impossible. We do not believe that such a development in the Assembly's powers should be ruled out for all time.

Merger with Dyfed Powys

- 8 While this would produce a police force near to the suggested minimum size, we are concerned about:
- what its name would be. Mid and North Wales might be workable but would ignore South West Wales;
 - Its poor alignment with other structures. No single organisation would share precisely the same boundaries. While some organisations would fall wholly within its area (e.g. North Wales Fire and Rescue Service), others would not (such as Mid and West Wales Fire and Rescue Service);
 - Its large size: if such an approach were to be adopted, there may as well be a single police force for Wales;
 - There would need to be changes to accountability arrangements (see below).

Merger with Dyfed Powys and Gwent

- 9 This would produce a police force above the suggested minimum size. We would be seriously concerned about this option, however, for the following reasons:
- no obvious name. "Rest of Wales police force?"
 - its extremely poor alignment with other structures;
 - there is no logic that Newport and Llanelli would be served by one police force while Cardiff and Swansea would be served by another;
 - South Wales police would not meet the criterion for minimum size, so why should other forces in Wales have to merge?
 - There would need to be changes to accountability arrangements (see below).

Single police force for Wales

10 If a separate police force cannot be retained for North Wales, then a single force for Wales would seem to be the next best option. However this would be

conditional on significant changes to the accountability arrangements that presently apply under the Police Act 1996:

- The police authority should consist solely of members appointed by county and county borough councils, with a minimum of one member appointed by each council. This would underline the role of the police within the local government family, given the impact that police spending has on council tax levels across Wales, and ensure that the Home Secretary concentrated on the strategic legislative, policy and funding framework. Any model of police authority which did not allow direct representation by each of the 22 councils would be unacceptable given that the police is partly funded through council tax;
 - Each Basic Command Unit in Wales should have a statutory board which would perform a scrutiny role in respect of performance of the BCU, its commander and the police authority member(s) who represent the area. The majority of members of the BCU Board should be appointed by county and county borough councils, with other partners in Wales such as community councils and the National Assembly appointing the remainder. Members of the police authority would not be eligible for appointment.
- 11 It would also be essential that, if a Wales-wide police force were formed, it should have no impact on the structure of the fire and rescue service in Wales. This is the devolved responsibility of the Assembly: the Minister for Social Justice and Regeneration has repeatedly made clear that the Welsh Assembly Government has ruled out changes to the number of fire authorities or a merger of their three control rooms.
- 12 In pursuance of this point, we would also be opposed to any change that impacted on the tri-service joint control room project in North Wales, which is nearing implementation. This is an excellent example of collaboration across the emergency services, in line with the agenda set in "Making the Connections", and will provide a robust, accessible service for people in North Wales. Technology should mean that, even if North Wales Police is merged with other police forces, emergency calls can continue to be dealt with in North Wales by call handlers who are familiar with its geography.