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**Police Federations of Wales**  
**Written evidence to**  
**The Welsh Assembly Government**

1. The Police Federations of Dyfed Powys, Gwent, North Wales and South Wales welcome the opportunity to place on public record its concerns and aspirations in response to the HMIC report "**Closing the Gap**" (A Review of the 'Fitness for Purpose' of the Current Structure of Policing in England and Wales) and for this information to be utilised fully through the devolved government structures in Wales.
  
2. The Police Federation of England and Wales (PFEW) was established in 1919 by the Police Act and is currently governed by the Police Federation Amendment Regulations 2004. It is the representative body for all police officers up to and including the rank of Chief Inspector, this equates to a total in excess of 141,000 officers of which 7,613 serve in Wales.
  
3. The four Police Federations of Wales are united, in line with PFEW, in calling for a Royal Commission into Policing and in their commitment to work with Chief Officers, Police Authorities and Ministers to ensure that any transition from the current to the future structure will be as smooth as possible.

4. Our statutory duty is to safeguard the welfare of our members and ensure the efficiency of the service and in light of that remit we are concerned that the source of funding for restructuring has not as yet been established. Early indications from The Association of Police Authorities in Wales and WACPO suggest a figure of between £47 million and £57 million with funding only available from Central Government, business rates or council tax precepts.
5. We consider ourselves to be a major stakeholder in this process and in pursuance of our desire to properly inform the debate, the PFEW has commissioned a report by Professor Roger Seifert, who comments on the 'Closing the Gap' document. This document makes very interesting reading and is attached at Appendix 'A'.
6. We believe it is vital that if reform is to take place, it is carried out on a basis of improved operational effectiveness not just financial efficiency. The public must be left with a superior, more effective police force that is able to deliver a better service.
7. In order to properly understand the requirements of our communities, we strongly urge Police Authorities to engage in structured and meaningful public consultation in line with Key Action 3 in APA circular 52/2005 (Appendix 'B')
8. It is essential that prior to any change due cognisance is given to the latest HMIC baseline assessments for the Welsh Police Forces, which cover ALL services and not only those 'protected services' referenced in the 'Closing the gap' document. It is against these levels that future

delivery will be measured to ensure that progress is in the right direction.

9. These assessments identify areas of best practice and performance, which could be adopted across the country to ensure a consistency of approach. We see this as a positive opportunity for the Police service in Wales to develop. There are many areas of existing collaboration and partnerships within Wales, involving the four Welsh Forces and these arrangements invariably extend to Forces outside of Wales.
  
10. It is essential for the improved welfare and efficiency of our members that best practices in relation to health and safety, resources, equipment and the supporting infrastructure is viewed as a priority and implemented appropriately. We already have several "centres of excellence" in Wales delivering driver training, firearms training and information technology and we must ensure that the advancements in such areas are not lost in the rush to restructure.
  
11. The ultimate aim for such major restructuring must be to dramatically improve the quality of service delivered to our communities. We are concerned that failure to manage the process effectively may result in some areas experiencing no improvement or worse still deterioration, with resources being drained from all our communities particularly in the area of Neighbourhood Policing. There is a genuine concern amongst Officers and within the communities we serve, that the creation of such a Strategic Force would mean the depletion of resources from the more rural areas that are already being policed with minimum staff. The Police Federation would require firm assurances

from Government that resources will not level out, but will increase in real terms – and in all forms- to meet the surging demands placed upon a modern service in both urban, rural and post industrial areas across Wales.

12. We remain concerned that the time period set out by Central Government, for consultation and delivery of proposals fails to take cognisance of the magnitude and expense of the project and would strongly urge that a Royal Commission is commenced.
13. Since the publication of the 'Closing the gap' document we are pleased to acknowledge that there has been considerable and meaningful consultation with Chief Officers (WACPO), local Police Authorities and yourselves, which has allowed us to represent the views of rank and file officers across Wales.
14. You will be aware that in order to comply with the constraints set out by Central Government, the Chief Officers of Wales have reduced the original seven options for change to three. That being said, there remains a belief that the outcome will be 'Strategic Force for Wales.
15. Creating such a Strategic Police Force in Wales in order to be able to respond to serious and organised crime must also assess the impact upon the traditional methods of policing across Wales.
16. We would seek to ensure that the increased emphasis on tackling serious and organised crime does not detract from the core function of

community based policing, which is currently provided by our Local Basic Command Units. The structure of these BCUs allows the police to be held accountable at a local level across a spectrum of urban, rural and post-industrial areas.

17. It is vitally important that the service we provide to our communities is protected and wherever possible enhanced.
18. We should maintain the resilience inherent within officers who have forged strong local links and not rush to withdraw them from their communities without fully assessing the impact.
19. The “latest risk” approach to setting priorities for policing has introduced the regular shifting of targets and objectives. The Tony Martin murder case highlighted a gap in the policing of rural communities and our focus moved to “filling the rural policing gap”. The events in Soham led to the Bichard Report and again gave a new priority in relation to information exchange and the use of information technology. We must ensure that in the rush to fill the Level 2 gap we do not undo or undermine the improvements and results we have gained in other areas of policing.
20. Currently the 7,613 officers across Wales are striving to provide the quality of service, which they feel the public deserve. The ethos of ‘what gets measured gets done’ is driving the focus of command teams to direct resources in a manner that creates ad hoc squads and units at the expense of core policing.

21. In recent research conducted by PFEW across Forces in England and Wales, Alan Gordon our National Vice-Chairman says he has found *“A dramatic picture of under-resourced units, staffed in the main by probationary Officers, vastly over worked, under supervised and working under intolerable strain to finish one job and move on to the next. It has been the case for as long as I have been a Police Officer that the 24/7 shift response Officer has always been under-valued and under resourced by the majority of senior managers and with the advent of the National Intelligence Model (NIM) this problem has been exacerbated. On one Division in one shire Force a variety of new units have been formed to implement NIM. These are staffed in the main with experienced response team Officers leaving the shifts depleted and with an average length of service of 1.6 years.”*
22. Wales as a country has wide-ranging and varied crime and disorder problems across a huge geographic area and there is a concern that the new structure could simply lead to increased bureaucracy and poorer communications, not better local results. What works in Meirionnydd or Monmouth does not necessarily work in Cardiff or Carmarthen; we must not lose sight of that fact. There are huge cultural differences across Wales and with no suitable road links across the Country any efforts to overcome such difficulties would be seriously frustrated.
23. Neighbourhood policing is recognised as the foundation of our success in Wales. We have local structures and partnerships in place to deliver a service that needs to be enhanced and developed.

24. We have a real concern that there appears to be an impetus for replacing patrolling police officers with non-attested staff and Community Support Officers (CSO). Despite the repeated requests of the Police Federation, there has still not been any evaluation of the CSO role. Even across Wales CSOs have different roles, powers, training and rates of remuneration. There is not even standardisation or consistency across some Force areas.
  
25. We urge that before there is any further increase of CSO numbers, there must be an independent review to establish the full impact they have upon policing at all levels which could form part of the remit of a Royal Commission.
  
26. A full activity based costing exercise, that is open and transparent to all parties, most importantly the public, should be a priority. It is our contention that at a cost of at least £28,000 per annum CSOs do not represent good value for money.
  
27. This is a real opportunity for 'conjoined working' by the four Welsh Forces and key stakeholders, which may lead to economies of scale. We must ensure that any savings are utilised towards the delivery of improved performance by an increased number of fully trained, well-equipped professional sworn Police Officers and not lead to a de-skilling of Police Officers.

28. The officers and staff of the four Welsh forces are their most valuable resource and staff needs and expectations will require careful management to ensure a seamless continuance of delivery at current levels of performance. Structural reform is accompanied by financial reform aimed at reducing labour costs. This has typically meant more intensive working, worse promotion chances, less clear accountability, deskilling of officers, endless references to leadership and good management without the requisite training and understanding; and lower overall real pay. In other services this has created low staff morale, higher turnover, early retirements, greater use of discipline as a management control tool, and unclear operational objectives.
29. Whatever the outcome of restructuring, the Police Federation is committed to maintaining the ability to negotiate officers' pay and conditions through the existing structures of the Police Negotiating Board (PNB) and the Police Advisory Board (PAB). A position that is reported to be supported by the Superintendents' Association and the Independent chair of PNB (Police review 30<sup>th</sup> September 2005)
30. Police Regulations have been nationally agreed and if managed correctly are not the inflexible regulatory barriers to effective management that some senior officers have publicly stated. We will strongly resist any attempt to dilute them.
31. It is vitally important to our members that the protection currently afforded to them under Regulation 21 (not to be posted outside of their current force area upon amalgamation) is retained.

32. The Police Federation is an apolitical organisation and as such it would be inappropriate for us to comment on the Devolution of Policing at this time.
  
33. The structures of the Police Federations' of Wales may have to evolve to accommodate this reform. However, we have taken the view that the representation of our members is our priority and believe it is too early to comment in any meaningful way at this time.