

## **Chief Constables' Council – Regional Paper Feedback**

<b>Casualty Bureaus</b>	
East Midlands	Noted
South East	Noted
South West	Noted
Wales	Not supported. The Wales region have suggested if option B were to be adopted it would require South Wales Police (SWP) to become the single force capability, with the cost being shared across the three forces – Dyfed-Powys, Gwent and South Wales Police. The proposal refers to the cost being shared “in proportion to the size and population of each force area,” which would mean SWP incurring the greatest proportion of costs and it is unclear if SWP would be expected to provide all of the training. Each force currently trains their own call takers and their own CB operators. SWP utilise MCIT staff in the event of a CB activation who are Holmes trained. Both Gwent and DPP utilise non-HOLMES trained staff and therefore their training involves more in-depth tuition resulting in Option B having cost implications for SWP if they were required to provide all of the training.
West Midlands	Noted and option 2 is preferred.
North West	Noted
North East	Noted and option 2 is preferred.
Eastern	Noted
London	Noted

<b>Stop and Search</b>	
East Midlands	Noted
South East	Noted
South West	Noted
Wales	Noted
West Midlands	Noted
North West	Not supported and requested a wider discussion was needed at Council. The general overview from the region was that this only applies to a number of inner city contexts and isn't relevant to many force areas. The region felt the guidance is arguably very restrictive and would have the effect of making officers increasingly risk averse.
North East	Noted
Eastern	Noted. The Eastern region have requested confirmation as to whether most forces will adopt the two day training package or if varying approaches are being taken as HMIC will need to form a baseline on training for inspection.
London	Noted

<b>s.163 Road Traffic Act</b>	
East Midlands	Noted
South East	Noted
South West	Qualified support. The region would welcome a discussion in terms of the impact of this being introduced and to receive feedback from Northumbria Police as to how this is developing as a pilot force and its operational impact and benefits.
Wales	Qualified support. The Wales region raised the below concerns which they believe should be explored as the data collection phase concludes: <ol style="list-style-type: none"> <li>1. Can collation demonstrate fairness and transparency and thereby improve public confidence?</li> <li>2. Would we establish proportionality with regard to the level of stops for different ethnic groups?</li> <li>3. Disproportionality would be identifiable and form a base for discussion for example at IAG's. However only age and ethnicity are in the pilot, would sex not be relevant?</li> <li>4. What impact will the collation of this data have on the effectiveness and efficiency of forces?</li> <li>5. Where forces have a mobile data solution to collect this information and provided this could feed into a stop search form/ticket issue, the administrative burden would be minimal. In forces where this is not the case, the collation of data is not an efficient use of time. It keeps both the officer and member of public at the location for longer and could also lead to fewer stops being made which would actually undermine public confidence in relation to reassurance.</li> <li>6. The likelihood is that the majority of forces will conclude the benefits do not justify the introduction of a requirement to record this data. It may be prudent to await the evaluation of the four force pilots to reach a more informed conclusion.</li> </ol>
West Midlands	Noted
North West	Not supported. The region has requested a wider discussion take place at Council. The general overview from the region was that this only applies to a number of inner city contexts and isn't relevant to many force areas. The region felt the guidance is arguably very restrictive and would have the effect of making officers increasingly risk averse.
North East	Noted
Eastern	Noted
London	Noted

<b>College of Policing Media Guidance APP</b>	
East Midlands	Noted. The East Midlands region felt the document was very lengthy and a one page plan and flow chart would be more useful.
South East	Noted
South West	Noted
Wales	Qualified support. The Wales region does not agree that officers subject to a complaint should be identified as a matter of course. The decision to name

Official

	should be the subject of appropriate decision making.
West Midlands	Noted
North West	Not supported. The region has requested a wider discussion takes place at Council as there are concerns with the terminology used. It was felt that it was too legalistic a point of view and the benefits of early naming of alleged offenders could enhance confidence for victims.
North East	Noted
Eastern	Qualified support. The region has requested clarity over concerns raised through feedback presented to the NPCC Communications Advisory Group relating to the release of custody images to the media. There had been an assumption that images should be released on conviction with no scope to consider vulnerable victims or other circumstances. It was commented that the Authorised Professional Practice (APP) does not take into account the capacity of communications teams to satisfy the demand of media while prioritising the most serious investigations or issues.
London	Noted

Special Branch Review	
East Midlands	Noted
South East	Noted
South West	Noted
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	*****S31/S24
London	Noted

Review of Police Core Grant and 2017/18 Settlement	
East Midlands	Noted
South East	Noted
South West	Qualified support. The region would welcome further information on how this will be updated and coordinated in terms of force/regional impact once further information is released from the Home Office, including a discussion of any proposed transition arrangements.
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Noted

Regional Paper for Council – 25/26 January 2017

Supported/Noted	Qualified Support	Not Supported
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London	Noted
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Commercial Collaboration	
East Midlands	Not supported. CC Simon Cole has had involvement in the CLEP programme and has commented that the ministerial target in the paper of £350M would be difficult to achieve. The section of 5.3 around firearms licensing, as the SRO for Digital Public Contact, CC Simon Cole, under the "transactions" work stream has asked the relevant people to make contact with the papers author. Appendix 1 doesn't include the interpreters and language services work stream. CC Simon Edens felt these small bids had a larger cumulative impact. The leadership roles were discussed as there was no clarity around the funding. The East Midlands Region would like clarity as to whether these full time posts were funded roles.
South East	Supported but concerns were raised with the arbitrary financial figure of 350 million within the paper and the basis for it. The region has agreed to support the advertisement of the new CLEP leadership roles.
South West	Noted – The region has requested that the wider issue of CLEP, its viability to achieve projected savings should be discussed at a future Council meeting.
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Supported but the region raised concerns regarding the CIPFA survey, specifically how this was conducted along with the validity of the outcomes and what they will be used for.
London	Noted

Online Child Abuse Referrals	
East Midlands	Not supported as Northamptonshire POLIT Team were one of the two pilot sites mentioned in the paper. The 95% accuracy quoted in the paper was what Northamptonshire Police experienced in their pilot. Content to support as helps manage risk, however, the majority of East Midlands chiefs felt this was just moving work from the National Crime Agency back to the Force. CC Simon Edens agreed to get a one page report written prior to Chief Constables' Council with the results of the pilot and circulate this.
South East	Supported but concern was noted that there will be a shift of workload from the National Crime Agency (NCA) to each force area. The region highlighted that close attention was required on the pilot and impacts on demand and requested a requirement to understand how the demand will impact on each force area and will look to the NCA via NPCC to provide required reassurances. A review of the business case is required.
South West	Noted
Wales	Noted
West Midlands	Supported however the West Midlands region felt there was concern that the volume of referrals arriving without a comms package may leave them with significant work to do and therefore cost implications. The region would like to see a more detailed proposal on cost implications and demand.
North West	Noted

North East	Noted
Eastern	Noted
London	Noted

Police Delivery Model – DBS Enhanced Disclosures Certificate	
East Midlands	Qualified support. Clarity is required as to why the paper is asking forces to support the scoping and development of a working model which could allow DBS to take over the disclosure process relating to vetting and barring in its entirety. Links should be made with the ongoing work of the national digital programme basing access on a verification of identity process which is common to other Government systems.
South East	Noted
South West	Noted. The region has requested future communications on the impact this will have on staff. Avon and Somerset are keen to provide a volunteer to work with Commissioner Dyson or with the strategic steering group
Wales	Qualified support. The region supports the direction of travel however they have requested a need for more information on how the issue of multiple IT platforms would be overcome. This is recognised in the paper, but there is no clarity as to how this will be approached.
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	<p>Qualified support. The Eastern region supports the scoping and development of a new working model on the basis that the work must evidence an enhancement to safeguarding and protecting the vulnerable. Clarity on the following points was requested from the region:</p> <ol style="list-style-type: none"> <li>1. Ongoing cost for access to legacy system, along with a continued need for DBS to have regular contact with Forces in respect of processing certain individual applications will be required.</li> <li>2. Requirement for consultation with: i) Stakeholders to prevent any prejudice to ongoing operations before any information is disclosed; ii) Records Managers as it is often necessary to refer to hardcopy files to substantiate information and assess accuracy; iii) Digital Strategy leads as not all forces are back record converting data resulting in a number of legacy databases operating locally which will continue to require searching and staff training to operate; National MoPI Team. At present MoPI requires the data retention clock to be re-set when a DBS disclosure has been made which is a locally administered process. Clear guidance on how will this be reflected is necessary.</li> <li>3. Clarity regarding who is to be held accountable for challenges around disclosures or failures at Judicial Review level. Liability of Chief Constables in terms of Data Protection (Data Controllorship) &amp; Section 22a agreements to be clarified.</li> </ol>
London	Noted

JIPH	
East Midlands	Noted
South East	Noted
South West	Noted
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Noted
UKPPS	
East Midlands	*****S23
South East	*****S23
South West	*****S23
Wales	*****S23
West Midlands	*****S23
North West	*****S23
North East	*****S23
Eastern	*****S23
London	*****S23
North West	*****S23
North East	*****S23
Eastern	*****S23
London	*****S23

Management of Registered Sexual Offences	
East Midlands	Feedback on paper withheld by S36
South East	Feedback on paper withheld by S36
South West	Feedback on paper withheld by S36
Wales	Feedback on paper withheld by S36
West Midlands	Feedback on paper withheld by S36
North West	Feedback on paper withheld by S36
North East	Feedback on paper withheld by S36
Eastern	Feedback on paper withheld by S36
London	Feedback on paper withheld by S36

Fraud Structures	
East Midlands	Noted
South East	Qualified support. The South East Region agreed roles and responsibilities that provide clarity and National Taskings. The region highlighted the lack of consultation with Forces, CoLP, Regional Organised Crime Units (ROCU) and SEROCU ECU leads. Thames Valley Police suggested a need to understand what regional resourcing and further concern regarding capability within the ROCU. There was a general consensus that further consideration is required to understand the impact this will have on calls for service and investigation.
South West	Qualified support. It was agreed that defining the roles and responsibilities at force, regional and national levels was sensible. However the South West has no dedicated regional communications officer. This makes regional protect and prevent campaigns as suggested a challenge for the region. The region supported the Tasking Model however the paper has limited detail therefore it is difficult to understand what extra demands will be put on ROCUs and forces. Tasking must have the ability to flow up and down rather than being one-way.
Wales	Qualified support. The Wales region supported the paper however requested further detail in terms of governance, structure and management levels to oversee and chair the relevant meetings as there could be further duplication in terms of existing tasking processes. Further clarification is needed prior to agreeing option 2 as follows: <ol style="list-style-type: none"> <li>1. What is the proposed structure of the local tasking – will there be a separate process for fraud and if so, how will that sit and interact with the existing multi discipline tasking process?</li> <li>2. At what level will the CofLP be involved, i.e. will they direct at Regional level?</li> <li>3. If the intention is to stream line the fraud referral process leading to more and better outcomes, how is the dedicated investigative capacity going to be improved to facilitate that improvement i.e. will there be an uplift in staffing levels?</li> <li>4. What controls are going to be introduced for nationally directed cases to ensure that a fair national coverage is maintained and regional priorities are still undertaken and prioritised where needed?</li> </ol>
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Noted
London	Noted

Football related CSA	
East Midlands	Noted
South East	Noted
South West	Noted
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Noted
London	Noted

<b>ERSOU Undercover Online Pilot</b>	
East Midlands	Qualified Support. However the East Midlands region felt there was a need to have a review of the ERSOU model.
South East	Supported. The South East region raised concerns around hidden costs and funding at a force level. The impact of cost on forces at a localised level will need to be considered as there will be an increase in demand. In supporting this paper the South East region would seek assurances that capability for ROCUs is supported by a business case which would include the impact on regional forces.
South West	Noted
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Supported. Clarity was requested regarding the timeliness of the proposal to secure funding for the national implementation on the basis that the existing pilot is 3 months into an 18 month venture.
London	Noted

<b>Counter Terrorism Update Paper</b>	
East Midlands	Noted
South East	Noted
South West	Noted
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Noted
London	Noted

<b>Troubled Families Programme Update</b>	
East Midlands	Noted
South East	Noted

Official

South West	Noted
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Supported. Queried whether the DCLG funding is dependent on local authority sign up and support for the troubled families model.
London	Noted

Pre-charge Bail (Policing & Crime Bill 2016) Progress and Commencement Update	
East Midlands	Noted
South East	Noted
South West	Noted
Wales	Noted
West Midlands	Noted
North West	Noted
North East	Noted
Eastern	Noted
London	Noted