

**Written evidence submitted by the All Wales Policing Team on behalf of the Police and Crime Commissioners in Wales (COR0089)**

This is in addition to any submissions made by individual Commissioners in Wales and the Association of Police and Crime Commissioners.

The Police and Crime Commissioners in Wales are:

Dafydd Llywelyn – Police and Crime Commissioner for Dyfed-Powys

Alun Michael – Police and Crime Commissioner for South Wales

Arfon Jones – Police and Crime Commissioner for North Wales

Jeff Cuthbert – Police and Crime Commissioner for Gwent

Our responses to the 12 questions raised by the Home Affairs Select Committee are as follows.

**How police and fire and rescue service business continuity plans are being designed to best safeguard the public and emergency service workers;**

1. In Wales the responsibility for Fire and Rescue services is devolved to Welsh Government. There is however good operational co-operation between the police and fire rescue services across Wales.
2. All Police Forces in Wales have plans in place to ensure business continuity arrangements are implemented in the event of a major disruption with the aim of ensuring the continuity of services. The plans set out the roles, responsibilities and actions to be taken to deliver and maintain the service following a major disruption to a minimum acceptable level until there is a return to normal. Exercises are carried out periodically to test their effectiveness and to ensure key staff who would be involved when a plan is invoked have confidence that the plan will work. As Commissioners we will ensure effective oversight of these arrangements via our governance and scrutiny arrangements. We understand these are highly unusual times and whilst wishing to ensure business as usual as far as possible we do not want it to detract from the police response to COVID-19. It is very much a question of undertaking our role of maintaining a balance of representing the interests of the public and acting as their voice along with supporting our Chief Constables, their officers and staff as well as our own teams.
3. As Commissioners we understand the importance of partnership working in these highly unusual times and we will use the uniqueness of our roles to work together with Welsh Government, the wider Criminal Justice sector and the third sector to ensure, as far as possible, an effective collective response to the pandemic in Wales. The All Wales Criminal Justice Board has been recognised as an effective means of joint working between devolved and non-devolved bodies in the interests of effective criminal justice working across Wales. The four Police and Crime Commissioners have regular calls with officials in Welsh Government as well as with the Policing Minister and the Justice Minister at an England and Wales Level.

4. It is important to highlight that effective co-ordination and communication arrangements were established between the Police and Welsh Government at an early stage of the pandemic through the Emergency Co-ordination Centre (Wales) ECC(W). Wales has the advantage of well-established and embedded partnership working arrangements between the Police, Welsh Government and the Criminal Justice system.
5. The Police Liaison Unit has a formal embed in the Welsh Government Emergency Command and Co-ordination Centre Bird Table three times daily (08:30, 15:00 and 19:30) seven days a week. This ensures policing in Wales is an integral part of the response arrangements to the pandemic and is able to highlight issues such as Personal Protective Equipment (PPE), Testing and effective and safe implementation of policies and regulations from UK government and Welsh Government. Developments are happening on a daily basis and it is important to be able to react consistently across Wales so officers can be clear about safe operational practices and the public are aware of what the rules are around lockdown restrictions. Consistent, concise and clear messaging is crucial to ensure compliance with the regulations and guidance to prevent the need for unnecessary police engagement with the public because of a breach of the regulations.
6. Maintaining attendance levels amongst officers and staff is crucial for business continuity plans. There was an initial impact when officers and staff were self-isolating because they were displaying signs they may have the virus as opposed to reporting with a specific illness. Since then attendance levels have improved considerably as the periods of self-isolation have ended and officers and staff have returned to work.
7. Agile working principles were already widely in place across the four forces in Wales which meant it was possible for staff to work from home and they were effectively pre-prepared and able to adapt their working practices. Connectivity using information technology and alternative means of communication has undoubtedly enabled business to continue as usual as far as possible under the current restrictions. This has placed a high demand on our IT Departments and they have commendably been able to maintain the infrastructure for agile working.
8. The safety and well-being of officers and staff is paramount if they are to remain available for duty and contribute to the delivery of the police response. There were initially concerns around the availability of Personal Protective Equipment (PPE) and testing although at this time both appear to have been addressed for policing in Wales.
9. In relation to PCR testing, which identifies the presence of the COVID-19 virus, the arrangements are currently adequate for policing needs in Wales.
10. Antibody testing is not yet available in the UK and that is felt to be crucial for a longer term solution along with a vaccine. Testing is a vital element of the strategy in relation to business continuity and welfare of staff. It is hoped that the PCR testing for policing across the UK will achieve its objectives to:-

- Provide police & fire with guaranteed testing provision it can rely upon given the uncertainty and volatility of the pandemic
  - Provide testing as part of a bespoke care package which understands the unique operational risks presented to our staff by COVID-19
  - Provide guaranteed turnaround time of 24hrs for results.
- Establish a testing infrastructure in readiness for the antibody solution
11. We also recognise the valuable contributions of both the national and local Federations as an effective lobby to safeguard front line members. Regular dialogue has ensured appropriate matters have been fed into Gold and the bird tables.

**What trade-offs will have to be made by police if a significant number of officers are unable to work at any given time, and the potential impact of those decisions;**

12. Fortunately this situation has not arisen and attendance levels have improved as officers returned to work following self-isolation. In addition volume crime levels have reduced by between 20-25% and public compliance with the lockdown restrictions has been very positive overall, albeit there has been some reporting of a relatively small number of non-compliance incidents. During the recent Easter period there was only a total of 290 fixed penalty notices across Wales in respect of Covid-19 breaches which is a relatively low figure and demonstrates a high level of compliance.
13. Had the situation been different then each of the Forces would have implemented their arrangements to prioritise resources, communicate with and reassure the public in order to keep them informed and to manage their expectations should it be necessary to reduce the level of service. Other measures might be considered such as time off restrictions including cancelling rest days and annual leave; redeploying staff to support critical roles; consideration of prioritising key functions; include limiting investigations of low-level crimes, short-term redeployment of identified HQ police officers to support response officers; and utilisation of volunteers within the community, including members of the special constabulary.
14. We request that HM Government extend the full lockdown beyond the weekend of the 8th May 2020, as we feel that any relaxation of the lockdown before or on Victory in Europe day (VE day) 75<sup>th</sup> anniversary will result in a backward step in preventing a second wave of Covid19 especially in tourist hot spots and make it impossible for the service to police demand following any relaxation. We firmly believe it will send out all sorts of mixed messages to public and police. We would encourage the UK and Welsh Government to work together to agree the lockdown extension as Welsh Government has the responsibility in Wales over this and the regulations governing it. **Our plea from a community safety perspective is to extend the lockdown beyond the weekend of the 8th May 2020.**

**How the Home Office and its major contractors are working together to ensure the safe and effective operation of contracted services is maintained, particularly where these services affect vulnerable people;**

15. There were initial concerns around the provision of PPE equipment and testing for the presence of the COVID-19 virus. The provision of PPE has improved to a point where currently provision is sufficient due to the excellent work undertaken through the SCGs. This has involved local procurement as well as central procurement.
16. In relation to testing for the presence of the COVID-19 virus, the centrally co-ordinated provision on behalf of policing across the UK has introduced arrangements that are currently sufficient for policing needs in Wales. Our testing is done via the Welsh Government and in particular Public Health Wales.

**Whether Border Force is sufficiently equipped to deliver any additional functions required of it during a period of heightened vigilance, and with reduced staffing;**

17. We do not have sufficient evidence to comment on this area.

**How Police forces will support each other if mobilisation tactics, or other forms of mutual support, are compromised by the imperative to limit the possible spread of the virus;**

18. There is a strong legacy of Forces in Wales working together and providing mutual aid as and when the need arises. The Policing in Wales Group meets on a quarterly basis and it is attended by the Welsh Police and Crime Commissioners and Chief Constables. This enables a co-ordinated and considered strategic response to issues that could or are impacting on Wales. In addition Forces in Wales have good working relationships with neighbouring Forces in England. North Wales Police are engaged with a group Forces in the North West of England and are able to assist each other across the region.
19. These arrangements are supported by the C3 architecture arrangements across Wales which link in to the wider UK response infrastructure.
20. South Wales Police operates the Regional Information and Coordination Centre (RICC) on behalf of the Southern Welsh forces. The RICC lead interfaces with the National Police Coordination Centre on a regular basis and would coordinate Tier 2(Regional) and Tier 3 (National) mobilisation requests in conjunction with colleagues in London.
21. For the period of the Coronavirus pandemic, a Chief Superintendent from Heddlu Gwent Police is acting as liaison officer on behalf of the NPCC Cymru region and is attending the weekly Silver meetings chaired by an ACC at, NPoCC.

**The preparedness of forces to support Local Resilience Forums during a possible civil contingencies emergency;**

22. Wales has the advantage of well-established and embedded partnership working arrangements between Police Forces, Welsh Government and the Criminal Justice system. The Policing Partnership Board for Wales already meets quarterly and it is

chaired by the First Minister for Wales or his Deputy. It is attended by the Welsh Police and Crime Commissioners, Chief Constables, Chief Executive of the NHS in Wales and the leader of the Welsh Local Government Association (WLGA). Welsh Government Ministers and senior officials attend depending on the agenda items. It is hoped that the meetings will also soon be attended by senior representatives from the Welsh Office, Home Office and MoJ.

23. These agencies ensure clear strategic leadership across Wales and as Local Resilience Forums are based on Local Authority footprints the Policing Partnership Board for Wales provides the appropriate forum to consider civil contingency emergencies at a strategic level.
24. As previously mentioned these arrangements are supported by the C3 architecture across Wales which link in to the wider UK response infrastructure and will reflect issues dealt with by Local Resilience Forums.
25. With regard to the Police and Crime Commissioners engagement with Local Resilience Forums in Wales there has been no difficulty if we wish to be represented and we have done so in some instances. However the feeling is that the forums currently deal with operational type matters and as we receive regular briefings directly from Chief Constables, force gold level briefings as well as daily updates from the bird table dial in's from the Policing in Wales Unit based in the Welsh Government offices, Cardiff, we are very much informed about what's going on and currently do not feel the need to attend the LRFs. That should be kept under review because Commissioners could, in certain instances, add value e.g. if there are VAWDA SV considerations Commissioners are doing a considerable amount of work in that area and could add value in terms of the current response and also how it might be beneficial going forward as we move to the recovery phase.
26. Chief Constables and Police and Crime Commissioners also engage in regular dial-in's to consider emerging issues from UK and Welsh Governments as well as updates from the National Police Chiefs' Council and the Association of Police and Crime Commissioners
27. The All Wales Policing Gold meeting chaired by an Assistant Chief Constable covering all Forces in Wales takes place twice weekly via dial in and encompasses feeds from SCG Chairs as well as specific force updates.
28. An All-Wales Criminal Justice System (CJS) Group was convened on the 6th of March 2020. This sits on a weekly basis, and comprises the heads of Criminal Justice from the four Welsh Forces, the CPS, HMCTS, HMPPS, the Legal Aid Agency, the Prisoner Escort and Custody Services, and YOS. The aim of the group is to communicate, understand and respond to interdependencies within the system which are intrinsically interconnected. This Group feeds into the NPCC Regional Criminal Justice Group which is run twice weekly. A Chief Inspector represents the Wales region at this meeting, which aims to capture and respond to emerging issues in the CJS.

**The effectiveness of Home Office communications to its partners, responders and the wider public about its preparations.**

29. It is important to emphasize the need for clear, concise, consistent messaging and guidance from UK Government. This also applies to the NPCC and the Welsh Government. Due cognisance must be taken of the arrangements in Wales and if this is not done there could be confusion in terms of how the restrictions are applied whenever there are differences between Wales and England. When issuing guidance it is important to be clear how it applies in England and Wales whenever there are differences between the two. As an example the advice to the police said the public shouldn't be sanctioned for travelling a reasonable distance to exercise. In England, Scotland and Northern Ireland there is no legal ban on exercising more than that. In Wales, which sets its own health regulations, exercising more than once a day is now illegal. Associated with this was the advice advanced by the NPCC who said it was lawful to drive to a location in order to exercise which conflicted with the Welsh Government advice and is therefore not being followed by the Welsh Chief Constables. These are examples whereby differences of interpretation could be used as a loophole to avoid compliance with lockdown and social distancing rules and potentially enable the virus to continue to spread.
30. We feel that the weekly dial in conference calls with the Policing Minister has been a positive measure and has enabled a two way flow of communication.
31. Timeliness has been an issue because national decisions are being made without always being communicated beforehand to the local level. As an example the announcement by UK Government in relation to the early release of prisoners had an impact locally. This was mainly in terms of determining whether there was sufficient housing and accommodation, the provision of support services for domestic violence, sexual violence, perpetrator services and drug treatment programmes.
- 32. The Home Affairs Select Committee issued a call for additional written evidence to inform their inquiry into Home Office preparedness for Covid-19 (Coronavirus) in relation to domestic abuse and risks of harm within the home during the crisis. Our responses are set out as follows:**

**The prevalence of these issues since the Government issued 'stay at home' guidance on 23 March;**

33. As reported by the National Police Chiefs' Council, the current Coronavirus situation has led to a significant reduction of recorded crime across the country. Whilst the level of domestic incidents has seen an apparent reduction since the 23 March 2020, we understand that the current unprecedented situation may be masking the actual level of incidents. We have and will continue to ensure a consistent message with our Chief Constables in that if anyone is in immediate danger they should call the police and they will respond. We will also seek to reassure anyone affected by domestic abuse that support services remain available during the UK lockdown. We will make it clear that the lockdown isolation instruction as a result of coronavirus does not apply if anyone needs to leave their home to escape domestic abuse.
34. In Dyfed-Powys the number of reports are down on the usual trend and at present we are not seeing the anticipated increase in reporting of domestic abuse or other forms of abuse. Our providers are also seeing static or reduced demand of referrals. We have

a number of communications which are being shared internally and externally to raise awareness, encourage reporting and ensure safety of those seeking help at this time. We would be keen for there to be a consistent approach on any amendments to workplace policies to ensure that employees suffering from domestic abuse, existing or new and whether known to their line managers or not, are being provided with consistent messages and provision of support.

35. Reporting is down in South Wales for domestic violence and abuse and sexual violence, services are reporting a drop in referrals at present but mirror the concerns about the actual prevalence. Support is predominantly face to face and those that have previously reported crimes appear to not want to worry the police by asking for an update as they feel the police have enough to do. Where support is continuing it is becoming clear that victims are requiring support regarding concerns about Covid-19 and impact on wellbeing can be noted, support calls are generally taking longer even though there may be less people being supported.
36. In Gwent the situation has now changed and is close to the average number of calls for police and the IDVA service. It varies across our support services but there is a decrease in referrals. We still suspect that due to the stress and conditions of COVID-19 and the fact that there is always underreporting the number of sexual violence, domestic abuse and VAWG offences the reality is still higher than the reports. We have a local Gwent Police/PCC campaign happening on 20 April 2020 that will reinforce Welsh Government messaging.
37. One of the challenges is that people who have previously accessed support may not feel able to not just because of safety but also that they may not wish to have support in the home environment and close proximity to their family members. We know some people have disengaged from services for this reason. Not having support and the stress of living in the COVID 19 context could increase needs and complex needs.
38. UK Government and Welsh Government need to better co-ordinate communications and if the UK is to lead on provision of guidance and campaigns it needs to ensure that Welsh services are also promoted – e.g. the National Helpline does not serve the people of Wales – Live Fear Free does.

**Measures or proposals to help support victims of domestic abuse and child abuse at this time;**

39. We welcome the MOJ additional funding. We appreciate there are time pressures but the timing i.e. around a Bank Holiday weekend made it hard for us to get all of the information required and to inform the best evidence base. This meant that only one of our providers was in a position to respond. It was also unclear about whether the funding was for the COVID period short or potential long term as well as the aftermath for which we expect there will be a significant increase in referrals and support requirements as people have more of the freedom to access support and safety.
40. As Commissioners we are responsible for commissioning the majority of local support services for victims of crime across Wales and we welcome Welsh Government's initiative – Live Fear Free helpline. We feel there should be improved

communications between governments and stakeholders which would support better wider consistent coverage otherwise campaigns lack impact or fail to gain momentum. We mention this in the context of a helpline campaign launched by UK Government #YouAreNotAlone which does not serve the people of Wales. Welsh Government have created or enhanced a series of funds ring fenced for VAWDASV and for the third sector more generally. This has been welcomed. We need support in ensuring that the MOJ funding and Welsh Government funding supports what it needs to effectively and minimise duplication.

41. Our links with Welsh Government have been strengthened in this area and we are also represented on the Welsh Government VAWDA SV Covid19 Strategic group. It is appropriate to mention that Welsh Government has allocated £1.2 million for dispersed accommodation provision, £10million to address emergency accommodation needs including domestic abuse and £200,000 capital funding to help provide refuges and support services with:

- Beds and mattresses to ensure there are sufficient beds for survivors in refuges
- White goods to ensure there is no risk of cross-contamination if there are consequences from having to isolate due to the virus
- Indoor and outdoor play equipment to mitigate the issue of school closures and social distancing, which is preventing access to external playgrounds
- IT equipment for children, young people and adults who have to study at home during isolation, or to enable staff to keep in touch with victims and survivors
- Soap and hand sanitiser to help maintain good hygiene

42. We also know that Welsh Government is already working with local authorities to acquire accommodation to meet the needs of vulnerable people, including victims of domestic abuse and those displaced for whatever reason during the current pandemic. This includes contracting for hotel and B&B accommodation with, importantly, the right support staff in place to support those individuals and households who are accommodated. As previously highlighted it has allocated £1.2 million for dispersed accommodation purposes.

#### **Measures or proposals to reduce or avert domestic abuse and child abuse at this time;**

43. Each of the Police and Crime Commissioner teams in Wales has put arrangements in place to ensure increased monitoring of crime trends and reduction in domestic abuse cases.

44. We are working innovatively at a local level to ensure we keep our communities safe. An examples includes in Gwent, where the Commissioner is looking at various systems including MARAC, Operation Encompass and offender profiles to try and identify vulnerable victims that are not currently making contact or reporting but could reasonably be at risk. For those victims local policing teams are trying to undertake observations of their homes while on targeted patrols. Moreover, Gwent



OPCC is working with its regional Safeguarding Board and Welsh Government to consider how it can further support children at this time.

45. This issue was extensively discussed at an extraordinary meeting of the All Wales Criminal Justice Board on 8 April 2020 around the potential delays to justice, particularly in relation to domestic abuse due to some Courts being closed and the open courts being busy. We will monitor the impact of these restrictions and work with the other Criminal Justice agencies on the ability of the CPS and the courts to specifically deal with domestic abuse cases both in terms of victims and perpetrators, the length of time these matters could take to process, bail conditions and the alternative arrangements the courts are currently seeking to use to maintain everyone's safety. We are aware the courts are exploring digital approaches to reduce the impact and we will engage with them to understand how effective those arrangements have been.
46. Work is underway in South Wales to ensure effective joint working to identify perpetrators who are high risk and have a history of domestic abuse in order to ensure information is shared to effectively assess and manage risk. The use of mosaic to target social media campaigns has begun, a coordinated messaging campaigning to highlight services are still available and encouraging reporting continue. South Wales have also used a known social influencer to deliver messages to children at risk. Information packs / posters have been delivered to local BCU's for dissemination to supermarkets, shops and pharmacies.
47. In Gwent we are also adapting the Welsh Government form, the MOJ info requirements and other information requirements to create one form which will help us to understand demand, provision, issues and risks. This will be taken to the Gwent Regional Safeguarding Board.
48. We are holding our usual LCJB at the end of April, which will focus on current risks and issues for the Board to address and consideration of existing provision of services with a view as to whether this is sufficient. The Board will also consider a paper regarding recovery planning.

**Preparedness of responders and service providers to address the needs of victims during the pandemic;**

49. In response to the pandemic every Police and Crime Commissioner team in Wales has been in regular contact with their respective service providers even prior to the lockdown. To date we have been able to ensure the continuity of services through a variety of alternative means via telephone and other virtual methods.
50. Overall, demand for services has either remained stable or decreased, however we recognise that true levels may be higher and as indicated above we are ensuring a consistent message that our services remain available, sometimes through alternative means such as texting and the police will respond to anyone who is in immediate danger. We understand that as the restrictions begin to ease we may see an increase in the number of reported instances. Work is underway to attempt to assess surge impact and contingency planning, to ensure services are able to cope and respond to projected demand.

51. It is important to highlight that our service providers have told us that people's needs have become more complex and support and contact is taking longer.

**The effectiveness of Government advice, co-ordination and support for responders and service providers.**

52. We feel that the initial government advice and co-ordination was slow and could have been better co-ordinated across the various Departments and between Whitehall and the Welsh Government.

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