

Police and Crime Commissioner for Dyfed-Powys response to: HMICFRS Inspection into Activism & Impartiality in Policing

I acknowledge the recommendations outlined in this report and will monitor the Force's progress in implementing them. The Force response to this inspection was discussed at Policing Board on 24th September 2024. This is the forum at which I hold the Chief Constable to account for the delivery of policing services across the Dyfed-Powys area.

The inspection activity fieldwork took place the week commencing 27th November 2023. Dyfed Powys Police was selected as one of the 12 forces inspected as part of the fieldwork for the HMIC Activism and Impartiality in Policing inspection. The Inspection lasted one week.

I welcome the recommendations (1, 2, 3, 5, 6, 7, 8, 11, and 14) for national bodies to amend guidance documents and processes to ensure consistency when it comes to impartiality. I will await the outcome of national recommendations alongside the Force and will ensure that the Force re-visit and review at a local level once these recommendations have been completed.

I set out below my thoughts and reassurances I have received from the Chief Constable in relation to the recommendations for Forces within the report.

Recommendation 4: By 31 March 2025, the National Police Coordination Centre should amend the online reporting form to require forces to provide information about the effectiveness of the policing style adopted in the event or operation and any allegations relating to impartiality. All forces should make sure their post-event learning reviews include evidence of the effectiveness of commanders' strategies in terms of policing style and impartiality. The National Police Coordination Centre should include information about policing style and impartiality in the learning updates they send to forces.

I have been assured that the Force do already carry out Post Incident Management (PIM) learning reviews for Commander led events. I will await the amended online reporting forms alongside the Force and will work with them to ensure that they are able to provide the required information.

Recommendation 9: Within six months of the College of Policing updating its engagement and communication authorised professional practice, forces should update their policies to reflect the College of Policing advice on communicating about politicised and contentious issues.

The Chief Constable has identified the Corporate Communications department and the Force Policy Officer as the appropriate staff members to review the College of Policing guidance. They will update policies accordingly.

Recommendation 10: By 31 March 2025, chief constables should give clear direction to their workforce about wearing and displaying visible representations. They should make sure that they clearly communicate such policies to the workforce and that they enforce the policy. Chief constables should regularly review these policies to respond to new causes that arise. The National Police Chiefs' Council should support chief constables in achieving a consistent approach.

The Force Uniform and Standards of appearance procedure contains direction relating to wearing anything which is likely to bring the Force into disrepute. This includes potentially offensive badges, logos or motifs. The Chief Constable has assured me that the wearing of charity badges/patches are with line manager's permission. They must not be too large and must not be in place of or obscure official police insignia. I have been assured that policies are reviewed every 12 to 36 months, however the policy owner may undertake a review sooner.

Recommendation 12: By 31 July 2025, chief constables should make sure that those personnel responsible for completing equality impact assessments are appropriately trained to do so. Chief constables should also make sure there are effective governance measures in place to improve the quality of these assessments and make sure they are completed when required.

Policy owners are aware of their responsibilities to conduct an Equality Impact Assessment, prompts are included within the policy template and policy framework. The equality, diversity and Welsh language department have guidance and a presentation on how to complete an Equality Impact Assessment as well as supplementary information on the intranet. Policy owners are aware that support is available from the department. The

department reminds staff through master-class sessions of other instances when an Equality Impact Assessment is required. There is robust governance in place to check and test Equality Impact Assessments which includes consultation with both internal and external groups. I have been encouraged that the Chief Constable has asked for the equality, the diversity and Welsh language department to conduct a dip sample of Equality Impact Assessments within the organisation to test how robust this guidance is. This will be carried out by the 31st July 2025.

Recommendation 13: By 31 March 2025, all chief constables should audit their policies that include or relate to the Equality Act 2010. They should make sure there is an effective process for regularly reviewing and updating policies and have appropriate governance arrangements in place.

I am assured that there is already a process for regularly reviewing and updating policies within the Force governance structure, via the Strategic Boards. In addition, the process for new or reviewed policies includes consultation from key staff prior to translation and publication.

Recommendation 15: By 31 March 2025, the College of Policing should publish new guidance on the role and use of external advisory groups, taking into consideration the results of its research and other relevant work. As a minimum, this should include guidance on:

- **terms of reference.**
- **selection and role of the chair.**
- **vetting or other appropriate security measures.**
- **recruitment, selection and tenure of members.**
- **reward, payment and expenses.**
- **training.**

It has been agreed that my office will review the Independent Advisory Group. I will ensure that this review will take the above bullet points into consideration.

Recommendation 16: By 31 March 2025, forces should update and implement their policies and guidance for non-crime hate incidents to provide clear direction to officers and staff for the assessment and recording of, and response to, these incidents.

A new hate crime lead has been appointed in Force to lead on this work. The Force policy and guidance has already been updated, with a draft copy pending approval via the governance structure.

Recommendation 17: By 31 March 2025, forces should make sure their recording processes for hate related incidents allow them to analyse data relating to hate crimes and non-crime hate incidents.

The updated Force policy mentioned introduces processes for hate related incidents that allow the separation of hate crime and non-crime hate incidents. This allows the Force to take specific action in relation to the correct recording of suspect/subject and analysis of the crimes and incidents. This will ensure that proper analysis of this data will be possible going forward.

Recommendation 18: By 31 March 2025, chief constables should make sure their force has an effective and efficient process for assessing and reviewing hate incidents.

I have been assured that guidance for officers and staff who have a role in the assessment and review of incidents will be provided on this matter. The new Force lead for hate crime will have a role in this. Hate crime and incidents are on the agenda for local daily management meetings.

Recommendation 19: By 31 July 2025, the College of Policing should work with forces to evaluate and improve the effectiveness of non-crime hate incident training. This should include consideration of the most effective methods of providing this training.

I have been assured that this has been set out in the renewed policy and guidance. The Chief Constable will ensure that this is implemented by the above deadline.

Recommendation 20: By 31 March 2025, forces should make sure they clearly define in policies the requirements for recording personal data for non-crime hate incidents. If the force approach differs from 'Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data', the force should record the rationale for this.

The updated Force policy mentioned introduces processes for hate related incidents that allow the separation of hate crime and non-crime hate incidents. This allows the Force to take specific action in relation to the correct recording of suspect/subject and analysis of the crimes and incidents.

Recommendation 21: By 31 March 2025, the National Police Chiefs' Council should publish a national terms of reference and governance structure for staff networks. The National Police Chiefs' Council and forces should withdraw funding and resources from any staff network that doesn't comply with these governance arrangements. The National Police Chiefs' Council should also publish guidance to forces to make sure local and national networks operate in a consistent and coherent manner.

There are established staff networks within the Force. There is effective governance in place via the People, Culture and Ethics Board. I have been assured that the Force will review in line with national terms of reference once published, to ensure they are being properly utilised.

Recommendation 22: By 31 March 2025, all forces should make sure they have a robust assessment process for allocating funding and giving support to their networks. They should prioritise funding and support based on local need.

There is effective governance of the staff networks in place via the People, Culture and Ethics Board. I have been assured that processes for allocating funding and support to the networks is carried out through this structure.

All of the above recommendations have been allocated by Inspector Richard Janas to Force leads and oversight will be maintained via Chief Officer led governance boards.

I am grateful for the publication of these recommendations. My team and I will continue to work closely with Dyfed-Powys Police representatives to ensure all relevant learning from insights generated through HMICFRS activity is acted upon to improve the policing service for the residents of the Dyfed-Powys area.