For Information	
Public/Non Public	Public
Report to:	Strategic Resources and Performance Meeting
Date of Meeting:	19 th July 2021
Report of:	Chief Constable
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Agenda Item:	4

Strategic Policing Requirement Compliance Update

1. Purpose of the Report

1.1 To provide members of the Strategic Resources and Performance Meeting (SR&P) with an update on compliance against our Strategic Policing Requirement.

2. Recommendations

2.1 It is recommended that members note our Strategic Policing Requirement compliance.

3. Reasons for Recommendations

3.1 To enable members of the meeting to fulfil their scrutiny obligations with regard to the effectiveness of Nottinghamshire Police's specialist capabilities.

4. Summary of Key Points

Strategic Policing Requirement Update

4.1 Understanding the Threat and Responding to it

The force has a good understanding of the potential harm facing the public. We have processes to identify current and projected capability and capacity requirements delivered by our Operational Support department based upon foreseeable threats and experienced demands contained within the Armed Policing Strategic Threat and Risk Assessment process. This process has matured over the past 3 years and includes a monthly and quarterly governance process allowing for all levels of review at operational, tactical and strategic.

The force is cognisant that The Home Office reviewed the SPR in 2021.

The armed policing strategic threat and risk assessment (APSTRA) conforms to the requirements of the Code of Practice and the College of Policing guidance. The APSTRA is published annually and is accompanied by a register of risk and other

observations. The designated chief officer reviews the register frequently to maintain the right levels of armed capability and capacity.

Trends in deployments are complex in nature with a number of influencing factors. One of the most significant factors in armed deployments is that they are incident report driven as opposed to purely crime driven, with some 80% of such deployments being spontaneous in nature. Very often such incidents don't translate into crimes. For example, a report may indicate a suspicious noise that sounded like a gunshot, however on making enquiries there is no such evidence of that taking place.

The current Covid-19 outbreak is a significant factor in the decrease in armed policing demands. 999 calls and incidents within the control room have seen a change to reports of breaking government guidelines and increased domestic related incidents linked to CV-19 as opposed to violence and use of weapons. Deployments in urban and traditional crowded areas have significantly reduced as national restrictions impacted on public footfall in these areas.

National security and terrorist threats have changed over recent years and there is an expectation and social imperative for the force to be capable of responding to a Marauding Terrorist Attack (MTA) in highly populated areas. Despite Covid, this remains a priority for the force and we ensure an effective armed response is always able to respond effectively. We measure ARV response across the force and specifically that of the City Centre. This year has seen marked improvements in all areas of ARV response. One of the reasons for this is the introduction of a patrol strategy directing the ARVs to 4 distinct areas based on analysis of discharges and deployments.

The force also has a good understanding of the armed criminals who operate in Nottinghamshire and neighbouring force areas. Nottinghamshire Police is alert to the likelihood of terrorist attacks and has identified venues that may require additional protection in times of heightened threat.

All armed officers in England and Wales are trained to national standards. There are different standards for each role that armed officers perform. The majority of armed incidents in Nottinghamshire are attended by officers trained to an armed response vehicle (ARV) standard. The force has sufficient ARV capability having recruited and trained additional officers during 2020/21.

4.2 Working with Others

It is important that effective joint working arrangements are in place between neighbouring forces. Armed criminals and terrorists have no respect for county boundaries. As a consequence, armed officers must be prepared to deploy flexibly in the knowledge that they can work seamlessly with officers in other forces. It is also important that any one force can call on support from surrounding forces in times of heightened threat.

These national arrangements remain robust ensuring specialist capability being available in the region if required.

Armed officers in Nottinghamshire Police are trained in tactics that take account of the types of recent terrorist attacks. Also, Nottinghamshire Police has an important role in designing training exercises with other organisations that simulate these types of attack. Training exercises are reviewed carefully so that learning points are identified and improvements are made for the future. Nottinghamshire has carried out its own benchmarking process against recently revised national guidance on such terrorist attacks and have undertaken training with EMAS and FRS during 2020 to ensure readiness for such attacks.

In addition to de-briefing training exercises, Nottinghamshire Police reviews the outcome of all firearms incidents that officers attend. This helps ensure that best practice or areas for improvement are identified. This knowledge is used to improve training and operational procedures.

4.3 Future Demand

A robust Strategic Threat and Risk Assessment (STRA) process in the areas of armed policing, roads policing and public order is undertaken to identify anticipated demand and the forces capability and capacity to meet these demands. These processes involve continual operational reviews, analysis of performance and outcomes and monthly/quarterly operational and strategic meetings in order to identify operational and organisational vulnerabilities and learning opportunities. This perpetual and dynamic process ensures that the workforce is sufficient in number and adequately trained and equipped to meet anticipated demand.

This section includes the below areas which are delivered by our Operational Support department;

- Public order
- Armed policing
- Roads policing
- Civil emergencies

Public Order

During 2020 our greatest proportion of demand derived from groups and individuals who questioned the existence of the COVID pandemic and the legitimacy and extend of the Government's response via restrictions on private / public life. Primarily this manifested itself in the form of small to medium sized protests, or occasionally marches, sometimes taking place on a weekly basis and usually centred around the Old Market Square in Nottingham City centre. These events did not involve significant disorder, but on occasions protesters did not follow regulations in relation to social distancing, public gatherings and the wearing of face coverings.

More recently in 2021 protests associated with the Police Crime Sentencing and Courts Bill (PCSC) which contains new legislation and police powers in respect of policing protests occurred. Events took place in Nottingham City centre involving

'Kill the Bill' open microphone sessions. These events attracted relatively small numbers and have been peaceful.

We also experienced a number of unlicensed music events and took a proactive approach to ensuring these did not take place due to the impact on the community and also the restrictions in place due to the pandemic. One such example led to the seizure of a number of pieces of equipment, and a recent authorisation to charge the organisers under the conspiracy to cause a public nuisance. This was the first case in the country in these circumstances to be charged.

The policing of football matches normally represents our largest consistent area of demand and reason for deploying PSU Officers in Nottinghamshire. This demand has been reduced due to the pandemic and the fact that all games are currently played behind closed doors.

In regard to future demand upon our public order resources we have a number of annual public festivals and events although they rarely cause significant public order or public safety issues. Plans have been in place for EURO 2020 in June 2021, with developing plans for the 2021 UN Climate Change Conference commitment, and the Commonwealth Games in 2022.

Going forward into the 2021/2022 football season, the outlook is constantly changing with plans to safely reintroduce fans into stadiums. With the current rollout of the vaccine and the target of vaccinating the majority of the UK by the end of 2021 it is likely we will see a full return of fans within the 2021-22 season. This could see a renewed enthusiasm for football spectators who will have missed out on a full season. Indeed, it is anticipated that an emerging threat may be that of a pent-up frustration over the last year of fans not being able to attend matches with a degree of uncertainty of how this may manifest itself. Intelligence is already indicating an intention of fans travelling to cities for away games, despite there being limited attendance to matches initially. Frustration may manifest into disorder within city centre and urban areas fuelled by alcohol consumption.

In summary, we predict our future public order policing demand to remain broadly stable when compared to the pre COVID period, regardless of whether there is a continued return to normality from COVID or a continuation of restrictions.

Our public order capabilities are assessed as good as informed by the annual Public Order STRA, which outlines the threats faced from intelligence assessments and operational demands. An assessment is then made to determine the public order capabilities and the capacity required with rationale in all areas. Our current level of capability and capacity is reviewed quarterly within the Public Order Governance Review process chaired by the ACC portfolio lead.

We are cognisant of the recently completed HMICFRS inspection of how effectively the police deal with protests. As part of our governance groups we have assessed and benchmarked the force against the recommendations and areas for improvement. As a force we have an effective governance and STRA process in place, which includes quarterly tactical and strategic forums. All major events and significant protests are fully debriefed with the outcomes shared with the National Police Coordination Centre's Strategic Intelligence and Briefing team. We ensure that there are links to community impact assessments in all plans and these are monitored through governance processes.

To meet our operational requirements, and despite potential disruption from COVID we have recently increased our public order resilience by training all new recruits to level 3 and ensuring that we have sufficient numbers of trained Commanders and specialist public order roles. We have also undertaken a substantial recruitment campaign, and this has already had a positive impact and will continue to do so. As a result, we assess that we are well placed to provide public order resilience nationally, regionally and within Nottinghamshire.

Civil Emergencies

The Emergency Planning Team (EPT) is part of our Operational Support Department (OSD) and co-ordinates force activity for civil contingencies. Our existing capabilities are routinely reassessed through the Local Resilience Forum (LRF) work plan.

The National Security Risk Assessment and local STRA processes inform our dedicated Emergency Planning team of anticipated demands. This informs a programme of planning, training and exercising events in areas such as natural events (flooding), technical failure (widespread loss of electricity) and social threats (terrorism, including cyber and CBRN). Continuing to work alongside the Local Resilience Forum (LRF) ensures an effective partnership approach.

We have effective LRF structures and processes, which ensures the identification of risk coupled with regular training and exercises of its response plans. These plans, tested with partner agencies, are reviewed and tested against a best practice regime and this work is highlighted through the LRF Work Plan which is generally on a three year rolling cycle.

Current and recent demand has been dominated by the Emergency Planning teams coordinating role within the force in responding to COVID, as well as that work with partners in the LRF.

We anticipate a future increase in demand due to the learning identified through the response to the pandemic, as well as the preparedness for future events in other areas. The national protect duty and the outcomes of the Manchester Arena enquiry, will again highlight, and drive the continuing requirement to work in a multi-agency partnership to address civil emergencies. The ability of our partners to manage multiple demands, such as the pandemic as well as other emergencies, has been tested and this in turn will impact on our demand in the coming months and years.

We are well equipped to discharge our duties, and this includes access to a trailer based temporary body holding unit and an equipment store containing emergency lighting and demountable structures. We also have access to a joint welfare unit with Nottinghamshire Fire and Rescue which can provide basic welfare for longer deployments.

In addition to these capabilities, the LRF uses its suite of plans to respond to a given incident. The EPT would provide technical advice, and the force would respond as part of an overall incident management structure. Typically, the force would be called upon to lead such a response and we have sufficient senior officers trained in this role.

There is significant learning for the force based on the pandemic response in emergency planning, both positive and areas for development. The surging of teams and the establishment of resource hubs to flexibly move staff to meet demand have been seen as positives and has been positively noted in the HMICFRS thematic pandemic inspection.

Armed Policing

We have very good governance in respect of armed policing which is driven by our Armed Policing Strategic Risk Assessment (APSTRA).

As part of the APSTRA we specifically measure the response of the 1st ARV to the city centre as this area contains the crowded places and most likely events and therefore the most heavily populated area.

All aspects of armed deployments are reviewed and provides us with a high degree of confidence in terms of accuracy of recording but also identifying trends and emerging patterns and issues to inform both training and operational practices.

Our AFO numbers are healthy overall, with a training course of new recruits currently taking place due for completion in July 2021.

We plan to uplift our armed capability further over the next 12 months to form an armed and unarmed taskable proactive team within OS. This team will be supplemented by AFOs from the ARV groups as required for planned operations but will also be tasked to unarmed crime / roads related operations.

In terms of Taser, we have a robust governance system and review all deployments which have remained stable despite the further uplift in numbers over the last year. We have received Home Office funding for more Taser devices and have progressed this during 2020/21 to enable a substantial uplift in the number of Specially Trained Officers (STO's) in front line local policing roles. This allows us to deploy additional STOs across all rotas in all areas and will address the threat to officers in rural areas and crowded places like the City Centre.

We are already well placed to meet all current demand including our ability to respond as required to any spontaneous or unforeseen local or regional events.

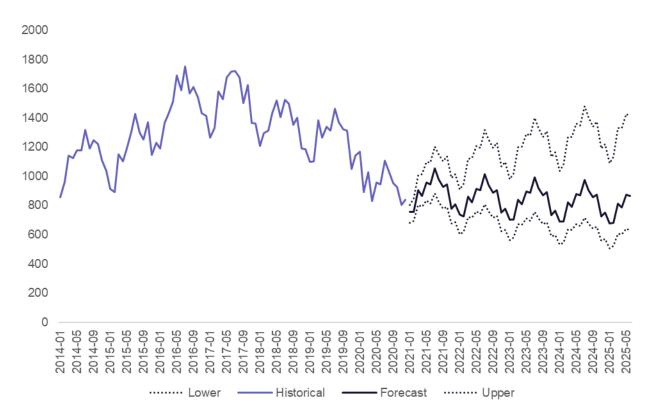
Roads Policing

Overall, there was a decrease in the total number of collisions and casualties on Nottinghamshire's roads in 2020.

In 2020 there were 110 (-24.8%) fewer serious accidents and 1 (-4.8%) less fatal accidents compared to 2019. These resulted in 128 (-26.7%) fewer serious casualties and 1 (-4.5%) less fatal casualty.

In terms of predicting future demands, volume of traffic continues to grow year on year on all our roads but Covid has had a significant impact upon volumes during 2020. It is anticipated as restrictions continue to ease; volumes of traffic will rise again particularly on the strategic road network. We have more miles of the strategic road network than neighbouring forces.

Road related offences have decreased over the last 5 years since 2015 by 20%. It is forecast that these will continue to decrease by 11 % over the next 2 years. This is illustrated in the chart below.



Our professional assessment is that the continuation of our preventative work will achieve this. However, it cannot be evidenced that road crime has reduced and an investment in roads policing enforcement could lead to an increase in recorded road crime. Of note our recent drink drive campaigns have seen an increase in drug drive offences being identified.

Undoubtedly Covid has had an impact on demand this year with up to a 60% reduction traffic on the roads, specifically during April 2020, affecting all roads policing demand but increasing our ability to undertake proactive work.

The forecasted decrease will undoubtedly experience seasonal trends, particularly for KSIs, as motorcyclist traffic increases in summer and lower speed collisions peak during wintery conditions.

There are many complex reasons for increasing and decreasing KSIs which make it difficult both locally and nationally to predict future demands. However, extensive research and analysis does indicate the major contributory factors to include:

- Speed,
- Use of seatbelts,
- Use of mobile phones and
- Drink or drugs

Specialist Roads Policing teams are provided by the ARV capability, a specialist Roads Policing Unit (RPU) and the Serious Collisions Investigation Unit (SCIU). The latter two maintain a holistic approach to policing the roads.

The Roads Policing Unit (RPU) is made up of the Road Crime Team and Roads Policing Team who focus on the specialist areas of enforcement where enhanced training and experience are required in dealing with pursuit, fast roads and motorway incidents. The RPU establishment has increased over the last year and plans continue through 2021/22 to increase the RPU establishment. This includes a significant uplift of resources for the Roads Crime Team to more than double the existing capacity to an establishment of 1 + 14. In addition approval has been given to uplift and double the Roads Policing Team capacity through the provision of 6 PCs to form an establishment of 1 + 12.

Although a comparatively lean structure, with the projected uplift in resource, the department will continue meet demand and provide adequate support to force tasking requests as well as sustain proactive enforcement and road safety activities.

There is a dedicated SCIU that operates within the force area and provides a 24hour scene attendance capability. The function of SCIU is to investigate serious and fatal RTCs, with these officers also trained to provide Family Liaison Officer (FLO) support. The Forensic Science Regulator (FSR) required that ISO 17020 & 17025 was adopted within forensic collision investigation by October 2020 however this has been extended to October 2022. The Forensic Collision Investigators (FCI) will require accreditation and it is anticipated, from experience in other forensic disciplines, that there will be an uplift of between 25-30% in the FCI workload due to ISO compliance. There is some organisational support from a national Expert Network Group (ENG) of nine regional representatives although this will not alleviate the work required for accreditation within the department. The ISO Programme Business Case is continuing at pace and Nottinghamshire first accreditation phase is anticipated to be by Autumn to winter 2021. The Nottinghamshire Safety Camera Partnership (NSCP) continues its current work to reduce road casualties with a view to increase true cross partner working. It is entirely self-funding with the revenue streams coming from the recovery costs from educational course attendance and the accidents records department being selffunding through recovery of costs for example, for the provision of RTC data to solicitors. All assets are owned by the partnership and expected costs are factored into the five year financial plan.

The NSCP has undertaken modelling on predicted demand based upon threshold for prosecution and has undergone a recent successful restructure to create the required staffing capacity. A remaining gap in capability is the element of investigation for multi-handled tickets, where offenders have sought to pervert the course of justice by providing false details or use false registration plates, that are subsequently not paid and present missed opportunities for fraud offences and OCG network disruption. This is being progressed through the Force Tasking system and the introduction of a police officer investigator into the partnership.

The Road Safety Partnership has been brought under the leadership of the Force Roads Policing tactical lead to enable co-ordinated tasking in conjunction with the Operational Support capability.

The NSCP will continue to seek educational opportunities through local partnership activity as Operation Highway including Fire and Rescue, Environment Agency, Highways and DVLA. The NSCP are also considering the Cumbria and Queensland approach with a casualty site across the Force area. This involves treating the whole Nottinghamshire county and city area as a casualty reduction site rather than specific areas within the force area.

Following the 2019 £500,000 ANPR upgrade project, we have maintained this estate, achieving nearly 2 million daily reads and feeding into the National ANPR System (NAS). Following the PCC's bid for the Home Office Safer Streets Fund, further cameras have been installed in Newark acquisitive crime hotspots and in addition the Force has committed further investment for inbuilt ANPR cameras within the RPU vehicles increasing our proactive enforcement capability.

During COVID-19 we have noted a substantial reduction in traffic and consequently a downturn in offences to process and the revenue stream for the Camera Safety Partnership (CSP). Whilst quieter roads are likely to be safer some may see the reduced traffic as an opportunity to drive faster. We will continue to monitor this area closely with particular attention to the impact on partnership finances to ensure the sustainability of the CSP.

Additional Strategic Policing Requirements

Terrorism

The national approach to countering the threat of terrorism is set out in the Government's Contest Strategy which is reflected through the four pillars within Policing:

PURSUE – to stop terrorist attacks. In Nottinghamshire the number of Priority Operations for which we were the area with primacy remained stable between 2018 and 2019. Nottinghamshire also continued to support operations nationally for which there is a Nottinghamshire footprint but that are predominantly focussed in another Force area.

PREVENT – to safeguard people from becoming terrorists or supporting terrorism. The number of referrals to Nottinghamshire Prevent rose by 27% between 2018 and 2019 and a further 18% between 2019 and 2020.

PROTECT – to strengthen our protection against terrorist attacks. Whilst the number of sites for which the Nottinghamshire Protect team have mandated responsibility has remained relatively stable, demand has increased due to a developed relationship with partners who are now requesting further support and advice.

PREPARE – to mitigate the impact of terrorist attacks. The Nottingham Counter Terrorism Security Advisors (CTSAs) currently work with Nottingham business consortiums and deliver advice to help elevate the impact of any attacks.

All strands of the Contest Strategy place demands on regional Police Forces. Each Force's Special Branch capability represents one element of a collaboration of police forces, working together as Counter Terrorism Policing East Midlands (CTP EM), an arm of the wider EMSOU collaboration. CTP EM in turn works in conjunction with other Counter Terrorism Intelligence Units (CTIUs), the larger Counter Terrorism Units (CTUs) and the UK intelligence community, together forming the Counter Terrorism (CT) Policing network.

Locally, the ACC of Specialist Operations chairs the Contest board that reviews all activity across the force. Recent force assurance visits from the Op Plato national team are reported into the Contest board and led tactically by Superintendent of Operational Support. This ensures there is a clear force approach and consistency to training and testing of plans relating to Op Plato.

Child Sexual Exploitation (CSE)

Organised CSE criminal investigations are led by the Sexual Exploitation Investigation Unit (SEIU) in Public Protection. In terms of Senior Investigating Officer (SIO) capacity, the SEIU has one detective inspector and one detective chief inspector who provide SIO capability and oversight.

The establishment is also supported by a CSE Disruption Team whose purpose is to bring early disruption and diversion and ultimately reduce demand. This team undertakes activity such as issuing Child Abduction Warning Notices (CAWNS) and conducting visits to suspected vulnerable young people and perpetrators who are believed to pose a risk. In addition, EMSOU provide some potential surge or escalation capacity to assist us in our efforts to investigate organised CSE. The force continues to build upon its existing strong relationships with partners across the county. We operate Multi-Agency Sexual Exploitation (MASE) panels to share intelligence, identify potential victims and manage victim based demand. In addition, we are looking to replicate this MASE model to help also focus on perpetrators.

We also continue to ensure that our Schools Early Intervention Officers deliver key inputs to young people on matters of CSE and consent to help prevent victimisation and reduce demand.

In direct response to current capacity challenges we are recruiting a Civil Orders Officer to improve our performance in pursing civil orders where we are unable to achieve successful criminal justice outcomes for CSE matters.

We are also taking steps to improve Professional Investigation Programme Level 2 (PIP2) throughout Public Protection by ensuring early registration of trainee investigators on the National Investigators Examination programme and implementing support and coaching though the allocation of PIP2 tutors.

CSE continues to be under reported and relatively hidden predominantly due to the targeting of vulnerable young females many of whom are unaware they are being exploited. In this context, and coupled with the steps we are taking, the demand originating from organised CSE is assessed as being manageable.

However, we are hopeful that through our planned awareness campaigns we will increase reporting of this hidden crime and encourage more people to come forward including current and past victims as well as the general public.

Cybercrime – Security – Information Services (IS)

As part of the National Enabling Project (NEP) deployment, our cloud and on premise services benefit from the security wrapper presented by the National Monitoring Service and complement local working practices and newly established roles to help reinforce our cyber preparedness and incident response. Our Office 365 cloud infrastructure is already live and our on premise services will be live in July 2020.

The National Management Centre (NMC) reports on vulnerabilities it detects in behaviours in the Nottinghamshire Police domain. The force has several technologies that protect the borders of our environment, which monitor and alert us to events that might expose a weakness and draw our attention to suspicious activity. We also have roles accountable for our IT security and configuration and our new working practices which manage the delivery of a robust patching, monitoring and anti-virus regime.

Our cyber security is also supported by our annual IT health checks which reviews our designs and management of our IT environment to detect vulnerabilities that could be exploited. We also commission external specialists to do this for us and from this they produce a report which informs a risk statement (GIRR) and associated action plan and tracker. This is reported monthly to the Home Office (NPIRMT) and our compliance certificate shows that we are trusted and safe to do business and to connect to the national policing systems.

We also chair the Nottinghamshire Local Resilience Forum (LRF) for cyber, alongside our partners such as the local authorities, health and the fire service. Work is underway to develop a shared protocol for alerting, management and incident response countywide.

Cybercrime – Investigations – Serious and Organised Crime (SOC)

Our Cybercrime team provides a specialist and dedicated capability to investigate all cyber-dependent crimes whilst also supporting and guiding other departments in their progression of cyber-enabled investigations.

In the past year, we have increased the number of (full-time) detectives in the cybercrime team from 2 to 3, as well as being innovative and recruiting an Intern and Cyber Apprentice to improve the provision of victim support, pro-active advice and local investigations and intelligence.

Capability is high; detectives are Associate Members of the Institute of Information Security Professionals (IISP) and hold the EC-Council Certified Network Defender qualification, in addition to digital forensic qualifications.

In terms of being able to support the National Cyber Security Strategy and Serious & Organised Crime Strategy the force can confidently play its role in mitigating the impact of a major cyber incident with a dedicated cyber team and deliver a response across the 4 P's (Protect, Prevent, Pursue and Prepare).

Cybercrime is a growing threat to UK national security and therefore requires coordinated commitment at national, regional and local level to develop an effective, collective response. Our Cybercrime Strategy outlines our priorities and plans to further strengthen our digital forensic support.

Since the Cybercrime team was set-up in 2017, we have benefited from additional national funding to ensure the team are equipped with the necessary equipment, resources and training, including digital forensics capability.

Cyber is a force priority and an intelligence analyst now provides information on the key risks and threats that could be reduced and prioritised through tasking.

Last year there were 545 cyber-dependent crime reports compared with 497 the previous year, representing a rise of 9.7% In addition, demand has continued to grow in the provision of support and training to other investigators across the force. We have, in part, driven some of this increasing demand as a result of our engagement with local communities, schools and businesses to educate and to advise against cyber-crime.

Notable successes for the team include an on-line competition launched across all Nottinghamshire schools to increase cyber awareness and the delivery of training in Cyber Choices to the Designated Safeguarding Leads resulting in 43% of all

referrals made across the East Midlands coming from Nottinghamshire. The Cyber Choices network was created to help young people make informed choices and to use their cyber skills in a legal way.

Consistently we have achieved 100% compliance against the national KPI relating to the investigation of all Action Fraud referrals notwithstanding our demand is the highest in the region. In the financial year 2020/21, we achieved joint 3rd position nationally in terms of cyber-dependent judicial outcomes.

The cyber protect and prevent officers are well supported by the regional engagement team's weekly calls to share knowledge and best practice, a regional protect strategy to ensure better coordination of the protect campaigns and regional websites developed for consistent messaging to individuals and businesses. Effectiveness of these campaigns is generally measured through the total reach in terms of the numbers accessing this information.

The East Midlands Serious and Organised Crime Unit (EMSOU) continue to coordinate the work of the local teams. This arrangement ensures we maximise the efficiency and effectiveness of local delivery, supported by the wider expertise, assets and resources of the Team Cyber UK network.

5. Financial Implications and Budget Provision

5.1 There are still unknowns regarding ISO accreditation most specifically relating to funding streams, this being reflected across all areas that are working towards accreditation.

6. Human Resources Implications

6.1 There are no direct HR implications as a result of this report.

7. Equality Implications

7.1 There are no direct equality implications as a result of this report.

8. Risk Management

8.1 Not applicable.

9. Policy Implications and links to the Police and Crime Plan Priorities

9.1 There are no policy implications as a result of this report.

10. Changes in Legislation or other Legal Considerations

10.1 There are no direct legal implications as a result of this report.

11. Details of outcome of consultation

11.1 There has been no additional consultation in relation to this report.

12.	Appendices
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12. None.