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Comisiynydd Heddlu a Throseddu Dyfed-Powys,  
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Dyfed-Powys Police and Crime Commissioner,  
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**COMISIYNYDD  
HEDDLU A THROSEDDU  
DYFED-POWYS  
POLICE AND CRIME  
COMMISSIONER**

Rt Hon Priti Patel MP  
Home Secretary  
2 Marsham Street  
London  
SW1P 4DF

24<sup>th</sup> March 2021

**RE: HMICFRS – An inspection of the effectiveness of the Regional Organised Crime Units (ROCU)**

Dear Home Secretary

I write with regard to the above mentioned report, which is welcomed by myself and Temporary Chief Constable Claire Parmenter.

The future state of the Force and Regional Tasking & Coordination process will reflect six key changes of the national design. The intended future state will deliver:

- A comprehensive law enforcement assessment of threat, risk and harm from SOC.
- A consistent process for the identification, prioritisation and management of the operational risk from SOC primarily OCG's, Priority Individuals & Vulnerabilities through the Regional Organised Crime Threat Assessment (ROCTA) team.
- The allocation of an appropriate response to the threat and mitigation of the risk at all levels.
- An informed assessment of the capability and capacity of the system to respond to the threat which allows for capacity to be flexed across the country if required.
- The allocation of an appropriate response to 'system wide' tasking and coordination of activity.
- Active participation in the system wide management of operational risk and the transfer of this through the system.
- A comprehensive assessment of the efficiency and effectiveness of the response.
- An assessment of gaps in capability and a prioritisation of these gaps.

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One of the fundamental problems in relation to the ROCU network is the paucity of a clear long-term funding model. This affects the ROCU in a variety of ways. Uncertainty about funding streams from one year to the next makes it harder to recruit and retain skilled staff as well as hindering the development of newer specialist capabilities required within the ROCU. As a result, the report has concluded the lack of a sustainable funding plan has made the ROCU network less effective than it could be.

Presently, Police and Crime Commissioners (PCCs) and Chief Constables from local police forces provide the majority of the funding and hold the ROCU to account. Additional funding comes from grants from the Home Office and numerous other small grants as they become available. It has been muted for a number of years the ROCU would be financed directly from central Government as opposed to forces but this is yet to materialise through the Comprehensive Spending Review for a number of reasons, most recently the pandemic. As a result, HMICFRS are suggesting that local interests, rather than regional and national threat, risk and harm affect how resources are prioritised within the ROCU. This could be seen to be at odds with the new national SOC Tasking System.

In answer to two of the recommendations raised within the report:

### **Recommendation 3**

**By February 2022, chief officers responsible for SOC in each region, with the chief officers of the affected forces, should make sure that systems are in place for SIOs and LROs to work effectively together.**

Forces are responsible for managing organised crime by using the 4P approach. In Dyfed-Powys, a Senior Investigating Officer (SIO) and Lead Responsible Officer (LRO) (Divisional Uniform Chief Inspector) is appointed to manage each Organised Crime Group (OCG) as soon as it is mapped and scored. In order to achieve a 4P approach to disrupting or dismantling the OCG, they should ordinarily do this by working with other partner agencies. When an OCG is escalated to the ROCU from a force for investigation, the ROCU will allocate a SIO. The SIO decides on the appropriate investigative tactics to disrupt/dismantle the OCG. However, the OCG still remains with the LRO in force, who is responsible for maintaining the 4P plan. Specifically in relation to the recommendation, Dyfed-Powys have always maintained overall ownership of any Dyfed-Powys OCG for which the ROCU provide a SIO and they continue to be monitored through the monthly Force Intelligence Development Group and SOC Tasking meetings. As the force has a good working relationship with the ROCU, the SIO and LRO

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continue to work together to ensure a coordinated approach in relation to tackling the OCG.

During 2019, specific LRO training was organised and delivered regionally to the three southern Welsh forces by a Home Office colleague. The training was due to be repeated again during 2020 but unfortunately it was not possible due to the pandemic, operational resilience and the restrictions on delivering training. It is hoped that as restrictions are eased during 2021, this training will again be delivered regionally. In Dyfed-Powys, in the absence of any formal training, specific guidance is provided to LROs to assist with their role and informal mentoring takes place between more experienced and inexperienced LROs. Force Intelligence Bureau also assist with the delivery of 1:1 informal training as and when new LROs are appointed.

#### **Recommendation 4**

**By February 2022, the chief constable with the lead for SOC in each region, with the chief officers of the affected forces, should ensure that a chief officer is appointed with responsibility for each ROCU, as far as practicable working autonomously of force responsibilities.**

The delivery of a whole SOC system approach will require threat, risk and harm to be managed at each of the Governance levels. The management of threat and risk in this way will ensure that prioritisation is consistent with the assessed risk and the escalation and de-escalation of risk is equitable across the system. This will be achieved through the redefining of the roles and responsibilities of the current tasking forums and the creation of a Regional SOC Coordinator (Chief Officer) role.

It is proposed by the national SOC System Tasking team, the Chair of Regional Tasking and Coordination will be the senior Regional SOC Coordinator and will be given the executive authority by all of the regional Chief Officers to task, coordinate and direct the totality of SOC resources 'at the Specialist Capability' level held in policing across the region against the SOC threats that have been identified and assessed. Many ROCUs already have a dedicated Chief Officer who are autonomous of force responsibilities and are the dedicated lead for SOC and other regional matters such as counter terrorism. This has not yet been agreed within the Southern Wales region. As South Wales Police are the lead force for the Tarian ROCU, SWP have always designated an ACC to have oversight of the ROCU but is not a dedicated Chief Officer lead. Within the recent inspection report, HMICFRS recommended it would be good practice for each ROCU to have a senior officer dedicated to regional responsibilities. As a result this will

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need to be decided by the three Welsh forces whether they wish to appoint a dedicated Chief Officer to oversee the day to day running of the ROCU. This was discussed in Welsh COG on 5<sup>th</sup> March 2021, no decisions have been made as yet, and this matter will be the subject of further discussions by Chief Officers. The SWP ACC will continue to chair regional tasking and the oversight board in the interim.

Yours sincerely

**Dafydd Llywelyn**  
**Police & Crime Commissioner**

Cc: Temporary Chief Constable Claire Parmenter

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