

Mr George Howarth MP
Chair, Policing and Crime Bill Committee
House of Commons
London
SW1A 0AA

15 March 2016

Dear Chairman,

Thank you for the opportunity to give evidence at the Policing and Crime Bill Committee this afternoon.

One area about which I was not questioned, but which I think is a critical part of the Bill is that relating to changes to the police discipline and complaints systems. Had I been asked about the proposal, I would have made two points which I would like to share with you.

My first point relates to the handling of police whistle-blowers and the change to the definition of what constitutes whistle-blowing, making it apply to a much broader range of allegations. I am concerned that the impact of this change could mean that the IPCC becomes the first point of contact for any disgruntled police officer or member of staff, and thus could undermine a Chief Constable's ability to properly manage their own workforce. I believe further discussion is required as to what constitutes whistle-blowing (and indeed, a whistle-blower), and what the IPCC's role is in dealing with such complaints.

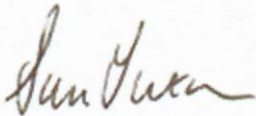
My second point relates to the requirement for the IPCC to independently investigate matters concerning Chief Officers. Rather than compelling the IPCC to investigate such matters, we would be supportive of a requirement for all such matters to be *referred* to the IPCC, and for the IPCC to use their operational independence in deciding whether or not an investigation is the most appropriate course of action.



I believe Dame Anne Owers, Chair of the IPCC would agree with both of these points.

Thank you once again for the opportunity to speak on this important matter. My colleagues and I are very keen to contribute where appropriate to help shape this critical legislation.

Yours Sincerely,



Chief Constable Sara Thornton
Chair, National Police Chiefs' Council