

The 2002 Motor Salvage Operators Regulations

Implementation by Local Authorities and Police

Research Study Conducted for the
Home Office

June, 2004

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Introduction

Background

This report outlines findings from research undertaken by MORI Social Research Institute on behalf of the Home Office Vehicle Crime Reduction Team conducted between January and April 2004.

The Vehicle Crime Reduction Team at the Home Office and NCIS wished to know how well police and local authorities are implementing their obligations and exercising their powers associated with the newly established Motor Salvage Operators Regulations.

There is known to be a large number of illegitimate motor salvage operators involved in criminal activities such as handling stolen car parts and cars. To reduce the problem, motor salvage businesses are now required under the Motor Salvage Operators Regulations introduced by the Vehicles (Crime) Act 2001 to register with their local authority, a process which requires the local authority to be satisfied that the operator is a 'fit and proper' person, taking into account the information provided by the police.

The Home Office wished to determine the extent to which local authorities are keeping these registers, and the extent to which the police are vetting individuals applying to be registered and exercising the powers they now have. They also wished to put together a list of names and address details of those responsible for keeping registers and vetting.

MORI was therefore commissioned to determine the following:

- *The extent to which registers are being kept by local authorities and the number of names on the registers,*
- *The extent to which police are carrying out their vetting responsibilities and the numbers of applicants police are vetting,*
- *The extent to which police are exercising their powers,*
- *The extent to which applications are refused,*
- *Barriers to implementation identified by police and local authorities, and*
- *The name and address details of those local authority officers and police officers who are responsible for implementing the regulations.*

Methods

A pilot study involving telephone interviews with five local authorities and five police forces was conducted, followed up with shorter telephone interviews to 200 of those local authorities with the highest crime rates (within their respective Crime and Disorder Reduction Partnership¹). This sample was provided by the Home Office.

The remaining thirty-eight police forces in England and Wales were also followed up with shorter telephone interviews. In addition, three Metropolitan Police basic command units were interviewed².

Ten depth interviews were also conducted with a range of local authorities and police forces to obtain a clearer picture of the registration and vetting process, and to determine barriers to implementation. Copies of the topic guides used in pilot and depth interviews are provided in Appendix A, and copies of questionnaires used in telephone surveys are provided in Appendix B.

Departments responsible for motor salvage operator registers vary widely across local authorities and the police, making them very difficult to locate. Nevertheless, we were able to locate most of these departments. Of the 205 highest crime rate local authorities provided in the original sample, there were only five (2%) for which we could not find a contact point. This brought the total number of interviews completed to 200. With regard to the police, we were unable to locate departments who were responsible for vetting in four police forces. This brought the total number of interviews completed with police to 41.

Acknowledgements

MORI would like to thank Jacquie Howley at the Home Office and Bryan Sheppard from NCIS for their help in developing the project. We also acknowledge our appreciation to all local authority and police representatives who both helped us track down the appropriate person to speak with, and those with whom we conducted telephone interviews.

¹ Those CDRPs who, in 2002 - 2003, had the highest vehicle crime, burglary, and robbery rates.

² Motor salvage operator vetting appears to occur at the force level across England and Wales, apart from the Metropolitan Police, where vetting tends to occur at the BCU level.

Publication of the Data

As with all MORI's studies, the results presented here are subject to our Standard Terms & Conditions of Contract. Any press or publication of the findings of this survey requires the advance approval of MORI and the Home Office. Such approval will only be refused on the grounds of inaccuracy or misinterpretation of the findings.

Summary

Local Authorities

Of the 200 local authorities we interviewed, most (74%) have set up a register. Of those who have not, many are aware they need to put one in place but have not yet 'gotten around to it'.

Over half (58%) of the local authorities who either already have a register or are in the process of setting one up have received applications from local motor salvage operators, on average receiving around five applications each.

On the whole, responsibility for keeping the motor salvage operator registers tends to be located in one of four main departments within local authorities:

- Licencing departments
- Environmental health departments,
- Trading standards departments, or
- Various law and legal administrative departments.

Processes to ensure all motor salvage operators are considered for registration are not well developed and consist mostly of informal measures, such as looking up names in the Yellow Pages, or developing a list of motor salvage operators known through related work in the local area.

Barriers identified by local authorities to the effective implementation of the regulations includes:

- Lack of time and resources,
- Lack of awareness of regulations,
- Locating the motor salvage operators,
- Lack of awareness of regulations in the motor salvage trade,
- Locating the correct police department to conduct the vetting,
- The splitting of responsibility for keeping the register from responsibility for enforcement,
- Low priority for police and lack of police action,
- Difficulties with protocols, and

- Determining the meaning of ‘fit and proper’.

Police

On the whole, police seem to be less aware of the regulations than local authorities.

Around four in five police forces we interviewed (83%) have had at least one request for the vetting of motor salvage operators from local authorities since October 2002 with the average number of requests per force being 19. Around a quarter of police forces we interviewed have not yet carried out any vetting since the regulations were introduced.

Only five forces we interviewed are carrying out enforcement activities at the present time with respect to motor salvage operators. This lack of activity amongst many appears to be for a number of reasons:

- Belief that local authorities are not doing enough,
- The sense that it is too early to begin enforcement activities with operators who have not yet registered,
- Police staff shortages,
- Many of those we interviewed were merely data handlers and did not know whether any enforcement activities had occurred, and
- Low priority for the police

In addition to those identified above, there are a number of barriers to the successful implementation of the police obligations of the motor salvage operator regulations:

- Confusion about who should conduct vetting,
- Lack of precise vetting guidance,
- Lack of standardised vetting forms.

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Local Authorities' Experiences

Extent to which registers have been set up

Are registers being kept?

Of the 200 local authorities we interviewed, three quarters (74%) have set up a register. Half (49%) have set up a register with names of successfully registered motor salvage operators, a quarter (24%) have set up a register but do not yet have any names, while another quarter (25%) have yet to set up a register.

Of those who have not yet set up a register, many are aware they need to put one in place but have not 'gotten around to it yet'. Other reasons include not knowing who the motor salvage operators are in their area, not having any motor salvage operators in their area, and problems with not having the time to set one up.

Others who have set up a register but do not yet have any names on it include those who have sent out letters to potential applicants but have not yet heard back from any, and those who are waiting for initial applicants to be vetted by the police.

Range of departments responsible

On the whole, responsibility for keeping the motor salvage operator registers tends to be located in one of four main departments within local authorities.

- licensing departments (e.g., ‘Licensing Unit’ or ‘Licensing Department’) usually by a licensing officer who has other licensing duties;
- environmental health departments (e.g., ‘Environmental Health Department’ or ‘Environmental Health Services’), again usually by a licensing officer who is based here;
- trading standards departments, or
- various law and legal administrative departments (e.g., ‘Legal Services’ or ‘Law and Scrutiny Services’) by one of a range of staff including licensing officers, solicitors, or administrative clerks.

Are there processes in place to ensure all motor salvage operators are considered?

Processes to ensure all motor salvage operators are considered for registration are not well developed in local authorities. Mostly these consist of informal measures, such as looking up names in the Yellow Pages, or developing a list of motor salvage operators known through related work in the local area.

Some use other methods, such as sending out letters to all scrap metal dealers, some of whom will also be motor salvage dealers. Sometimes the Environmental Health Agency provides a list of all scrap metal dealers to assist this process.

Well what we've done is we went through the Yellow Pages, we also looked at the existing scrap metal yards that we had registered and we sent letters out, explaining that, you know the procedures where what the new law was and put it into a category, you know that if you fall within this category you need to be registered with the authority.

Local Authority

Others have asked the police to provide them with names of motor salvage operators, with varying degrees of success.

We were waiting for information from the police, we've not been informed. The police were going to inform us of the motor salvage operators that may be operating in our area and we were going to be given that information...until we've got that, it's sort of a dead file really.

Local Authority

How many applicants?

Of the local authorities who either already have a register or are setting one up, 116 (58%)³ have received applications from local motor salvage operators. These, on average, have received five applications each although this varies (standard deviation is 3.5). Commonly, local authorities have received just one application (22% of those who have had applications report having had just one) but the total number ranges up to 19.

Refusals

Local authorities are refusing applications from time to time although the majority of those we spoke with had not refused any. (Appropriate) refusals seem to be more likely among those councils and police who have good communication levels and high levels of police proactivity. There perhaps is a sense, at least among a few, that some applicants who perhaps should be refused are not being refused due to the police who are conducting the vetting not passing on relevant information to councils. There is a feeling that perhaps some police would prefer to have all applicants registered, regardless of their background, because they hold the view that police have powers of entry only over registered operators.

One Council has refused one operator which has progressed to the Magistrates Court. The Council involved has a reportedly good and communicative relationship with the local police, who conduct vetting for them. One police force has had one situation where vetting has shown an applicant to have not disclosed a known criminal history. This has not resulted in a refusal, but rather is currently being 'sorted out' by the relevant police. Thirdly, another Council has had a problem with one operator providing an obviously incorrect and 'silly' name on his application. This apparently caused quite a few problems for the Council and had to be resolved at quite high levels within the relevant police force.

³ i.e., all of those who have a register set up with names, and some of those who are in the process of setting up a register.

Barriers to effective implementation

Local authorities identify a number of barriers to the effective compliance with their obligations to register motor salvage operators. Common barriers include:

- **Lack of time and resources**

Lack of time and resources was the most common spontaneously mentioned barrier to carrying out their responsibilities associated with maintaining the register (mentioned by one in eight or 13% of all local authorities).

I don't think it's a problem with the system. It's simply one of those things I'm aware I have to do – it's just finding the time to do it.

Local Authority

I would say resources, staff resources as well. It takes one person to do that job, as well as the things we have to do day to day.

Local Authority

It would be down to budget constraints and resources, because really we should be out scouring, and looking for them.

Local Authority

- **Lack of awareness of the regulations by local authorities**

Around one in ten (9%) feel that they are not as informed about the regulations as they would have liked. This has impacted on fairly basic tasks involved in setting up registers. For example, a few feel they have been hampered in their progress by delays in decisions about which department within the authority should be responsible for looking after motor salvage operator registers.

We had an internal debate about where the responsibility should lie, the department, which function, and it bounced between our licensing department and environmental health.

Local Authority

Related to this is confusion about the differences between motor salvage operator regulations and the scrap metal dealer regulations. For example, some believe that scrap metal licences and motor salvage operator registrations are the same thing while others think they overlap. One local authority felt that it would be good to merge the Scrap Metal Dealers Act with the Motor Salvage Operator Regulations:

Yes, they say the motor salvage is not the same as the motor scrap dealer licence. Now I really can't see the difference, so I'm getting the licensing officer to actually ring me back to find out why it doesn't cover motor salvage – I can't see a difference between them.

Local Authority

With the motor salvage operators' rules, because it's essentially the same sort of person dealing with it and I don't really see what the point is of having two systems and it will also have the same impact. The theory behind the 1964 Scrap Metal Dealers Act is that the police are notified and know where to go, to find where the scrap metal dealers are if they think they are dealing in stolen goods.

Local Authority

No, I mean, I don't think we've had any problems. As I say, the ones that we have already got licenced with us, they were there before this new motor salvage operator thing came in, so they're here.

Local Authority

- **Locating motor salvage operators**

Around 6% feel that it is very difficult to locate those motor salvage operators in their area who should be on the register. There is a belief among local authorities and the police we interviewed that in some cases there are many more motor salvage operators in their area than those who apply to register. Commonly, application forms are sent to many more than those they receive back.

Based on local knowledge I think there's about 30 to 40 motor salvage operators, but we only have six registered.

Police

We sent out quite a few that we thought would need licensing, but only two have actually registered, so I think probably people are either totally ignoring us or they are ignorant of the fact that they've got to register you know.

Local Authority

There are certainly no problems with the police. I think the main problem is finding people that the regulations apply to, in that respect, that's really our main difficulty. No, I mean, the police have been fine and we've set up a proper system with them and everything's worked well, as far as that's concerned.

Local Authority

I think the one aspect we'd probably think of [in terms of needing help] is that there may be a lot of existing businesses out there right now that do need to be registered and it's trying to get those on board.

Local Authority

One or two are concerned that those operators who are involved in illegal activities are less likely to apply for registration and are interested to know how to best target those.

I don't know because responsible operators are not going to be a problem registering. It's the ones we don't know about, the illegal ones, that aren't really regular, yeah it's a problem with the legislation.

Local Authority

- **Lack of awareness in the trade**

Another perceived barrier is the confusion amongst motor salvage operators themselves about their need to register. One in 10 (10%) of local authorities stated lack of response or slowness of response by operators to requests for them to apply as a barrier to complying with the regulations. A few local authorities feel that there is some resistance among operators to apply, and described a general lack of understanding in the motor salvage trade.

I think most applicants are unclear on what constituted motor salvage operators, because it had to be a particular proportion of their work doesn't it that's motor salvage so we just sort of had to write to everyone dealing with cars and I think most people were a bit vague on whether they needed to register or not.

Local Authority

This led some local authorities to suggest that more education of the motor salvage operator trade is necessary.

I think that maybe more advertising within the sort of trade about the need for it, because certainly we came across this motorcycle breaker, he says 'I'm not a scrap dealer'.

Local Authority

There's no process as far as I can see in the regulations, notifying any dealers that they would be required to register.

Local Authority

- **Locating the correct police department to conduct the vetting**

Another barrier to local authorities successfully implementing these regulations is the sense among local authorities that it is difficult to determine the correct police department to conduct the checks.

I mean, with regard to the vetting we were quite lucky in that I used to work for the police, so the people who actually did the vetting knew me and they set up this, I'm aware there were some local authorities who couldn't find anyone who'd do it on their behalf. We were lucky our local officer did it on our behalf.

Local Authority

Well, it almost seems as if the police themselves were unsure themselves and have not been able to help us.

Local Authority

Right, initially we were given the wrong contact at the police and that delayed the process considerably because we have a local authority liaison officer and so we went through her and she made enquiries and then gave us the name. We were getting operators ringing up and saying we haven't heard anything at all.

Local Authority

One local authority contact we interviewed does his own vetting.

I haven't asked the police, and I'll tell you the reason. My department is part of the Environmental Health Department and I'm responsible for taxis licensing and I vet all the applicants for licences, so I routinely am doing vetting procedures, many of them, many times a day, so I can go through the disclosure and vetting procedure myself, so it's quite comfortable and I'm authorised to do so.

Local Authority

- **Splitting of register from enforcement**

There is a feeling by a few local authorities and police that it would be better if the police had responsibility for the register, or, alternatively, that local authorities should have more enforcement capabilities.

Yeah, I think the difficulty is the way that the regulations are at the moment is that it's only the police who have right of entry to check the premises and if local authority officers had a right of entry, then we could be checking whether premises should be registered or not. Seeing as it's our responsibility to keep the register, but we don't have any right of entry for inspection purposes, so that's something I think we should have.

Local Authority

It doesn't make sense to me that if they are the licensing authority that they can't prosecute for someone who is operating without a licence. They certainly do it in completely different areas.

Police

It is thought by some local authorities that the move to reducing police paperwork would make it unlikely that responsibility for maintenance of the register would transfer to the police. Nevertheless, they feel it should not be the role of the authorities to look after the register since the police are the ones to carry out enforcement.

We do know that we have one operator in the area, who hasn't come forward. We haven't got the power to enforce and the police have the power but don't want to use it. We've got one maintaining the register and one doing the enforcement which never works. I think the police, like with firearms, should maintain their own register, or the local authority, like they're going to do with the new alcohol licensing, maintain their register and do their own enforcement.

Local Authority

- **Low police priority and lack of police action**

Although quite a few local authorities feel they have a very good relationship with the police responsible for vetting -

One of our officers here goes over regularly, doing the work, to chat with the police officer dealing with that one and they're making up lists of prospective people that will need possible registration and who haven't responded to our letters.

Local Authority

- around 8% spontaneously mention that they feel there are some problems with police viewing motor salvage regulations as a low priority. Alongside this, local authorities feel there are problems communicating with police, police being slow to conduct vetting (or not wanting to conduct vetting at all), police being slow to act, and uninterested in enforcing the regulations.

We sent stuff [to the police] but we don't get comments back. Or certainly they haven't looked at the register.

Local Authority

The main difficulty is that initially when we were co-operating with the police on this particular register, as it is vehicle crime, it was allocated to the crime prevention team which was very short of staff and overworked and we didn't get an awful lot of co-operation from the police. But more recently they've had it allocated to sort of some officers specialising in vehicle crime and things have picked up quite considerably since then.

Local Authority

Police lack enthusiasm and we do not know who is in charge.

Local Authority

The local police force are very suspicious of information provided to them. Long delays too. We're not happy with the police checks and would much prefer the whole thing to be done by CRB.

Local Authority

Yes [there are barriers]. The XXX Police. We're still waiting after all this time for a meeting. The police have the power but they don't want to use it.

Local Authority

The police have not been helpful.

Local Authority

This problem is more noticeable when vetting is conducted by non-operational police such as by those in disclosure units. In those cases where the local authority requests vetting which is sent back directly to the local authority, it is felt there is no opportunity for operational police to comment or gather intelligence.

We haven't really got proper liaison with the police on the whole issue. We haven't really gotten to the bottom of it. I mean I've got a contact name, an inspector, but you see he's up to his neck in liquor licensing and I don't think, you know, at the moment it's not totally satisfactory.

Local Authority

- **Difficulties with protocols**

Some local authorities (4%) are experiencing problems setting up protocols with local police forces. These, however, appear to be limited to only one or two police forces. The main problem seems to be the issue of whether the police should require an indemnity.

What happened was that the police have told us that before they do any vetting for us, or comments, they require us to sign an indemnity to them. The form of indemnity that they have requested us to sign, our legal advisors have instructed me not to sign, because it's too onerous and they don't feel it's appropriate for us to sign. But the police are refusing, unless we sign this indemnity, they are refusing to process any applications, so we've been stuck in this yo yo for months. It's cost us well over a year's progress because they refuse to budge.

Local Authority

We'll like I say, there was some delay from the police over the protocol because at one point they were accepting that if something went wrong they wouldn't accept responsibility for giving us false information and if we acted on false information so obviously we had to clear that up and that's why arguing between the police and our legal department about getting the protocol right is what's caused the major delay in setting it up.

Local Authority

- **Determining the meaning of 'fit and proper'**

One or two local authorities would like to see more guidance about how best to interpret the term 'fit and proper' and some feel the police are perhaps best placed to make this decision.

We'll the biggest problem is that the legislation makes allowance for what we feel is 'fit and proper'. However they don't put what the 'fit and proper' test is, that's down to us to decide.

Local Authority

Yeah, I mean I would have thought that the police, I mean you know sort of they more or less said well you know this person had an unspent caution and it's up to us to determine whether we object to the register or not. We just put them on the register and I would have thought it would have been up to the police.

Local Authority

Police Experiences

Awareness of Regulations

On the whole, police tend to be less aware of the regulations than local authorities. Mostly, police forces tend to learn about motor salvage operator regulations from local authorities, usually after requests for vetting have occurred. When local authorities first request vetting, police forces then tend to set up, in conjunction with the authority in question, mechanisms by which this can occur. These seem to be generally formal signed memoranda of understanding, which have often previously already been set up to handle other vetting activities.

Extent to which vetting is being carried out

Of the 41 police forces/ BCUs surveyed, around four in five (83%) have had at least one request for the vetting of motor salvage operators from local authorities since October 2002.

Of those who have conducted vetting for local authorities, the average number of requests has been 19 per force/ BCU, although there is a large range, between one and 60. There is also large variability in the number (the standard deviation is around 18).

- Around a quarter of police forces we interviewed have not yet carried out any vetting since the regulations were introduced. This appears to be for a number of reasons. Aside from the four police forces for whom we could not locate a contact point, there also appear to be a number of forces without any motor salvage operators in their area.

Others said they were the correct department but that no vetting had been requested (6 out of 41; 15%).

The Force Crime Manager raised motor vehicle salvage legislation in a meeting this morning as something that could help us with enforcement. He's been in touch with the council. The Council have nobody who deals with this and we're now saying perhaps we ought to look at this. We have nobody who pursues checks. That's the best way of putting it. There may well be a book somewhere on somebody's desk. Whether anybody writes in it is another question.

Police

It's just a bit of a mystery at this end. As far as I can tell no one is doing vetting, but I just find it hard to believe that XX local authorities are supposed to be doing something and none of them are.

Police

There are a number of departments that tend to be responsible for vetting. The most common departments are dedicated 'Vetting Units', also called 'Disclosure Units'. In these situations, police contacts are responsible merely for vetting names which come to them directly from local authorities themselves. Sometimes these are requested via the Police National Computer (PNC) Unit in the police force, which is often the unit responsible for the initial set up of the protocols.

Although many are vetted by the disclosure or vetting units at the force level, sometimes police officers working out of local police stations take on the role of vetting for the local authority.

Enforcement activities

Only five (11% of all; 15% of those who have been carrying out vetting) of the 45 police forces/ BCUs we interviewed are carrying out enforcement activities with regard to either registered or unregistered motor salvage operators.

It seems that enforcement activities are simply often not being conducted. Nineteen out of the 34 who are involved in vetting activities (56%) say that there is *no* enforcement activities going on within their force at the current moment.

One reason is that some of those we spoke to simply do not know whether enforcement activities are occurring, as their responsibilities are only to carry out the vetting and they do not have any knowledge of operational issues. This was the case for a significant minority - around a quarter (24%) of those police interviewed.

However, there are a couple of reasons put forward for why enforcement activities are commonly not being carried out. Firstly, some police feel that it is still too early to begin enforcement activities with motor salvage operators who have failed to register.

Until the register has been set up for a while and people have been given the opportunity [to register] then I mean we can't really do anything in that meantime. Obviously the yards that have been registered we can then have the power of entry on the examination of records, and obviously they have to account for the vehicles that are in there.

Police

Staff shortages and lack of priority within the police are also identified as problems contributing to lack of enforcement.

Yeah well I mean I have been starting to make a list myself, just going through motor magazines. So I go through the magazines and find out who has an advert for spares for Toyotas or Fiats or Fords. If their address is not on our borough list then I'll make a note of it and if that person hasn't registered in a certain amount of time and the Council is aware and they've sent them the details, we'll go and visit them.

Police

As discussed earlier, quite a few local authorities themselves are also of the view that the police are not interested in enforcement.

Well the thing is, at this moment in time we're actually starting to draw up prosecution papers against the yards who haven't registered and we've got to the stage now where we've got to start prosecuting them because it doesn't look like the police are ever going to get involved and say, right we're going up to this yard now.

Local Authority

Barriers to effective implementation

Police identify a number of barriers to the successful implementation of the motor salvage operator regulations, many of which overlap with those mentioned by local authorities outlined earlier:

- Lack of awareness of the regulations
- Lack of awareness in the trade
- Splitting of responsibility for the register from enforcement
- Low police priority
- Difficulties agreeing protocols
- Determining the meaning of ‘fit and proper’

Those specific to the police are discussed below.

- **Belief that local authorities are not doing enough**

A few police forces, particularly those who are very active in vetting and enforcement, feel that some local authorities are not interested in the issue of motor salvage regulations.

And I guess, through the local government office, to encourage, if not enforce, local authorities to play their part. I think we're faced with the same problems in this area as we are with vehicle abandonment. It's actually getting them to act on the issue, and that the level of activity and co-operation within local authorities, when the police are working in partnership with these people, is variable. Some are more co-operative than others. And that can be personalities as well as the agencies themselves.

Police

Local authorities need investigating to see if they're doing it properly – not all are asking to be checked.

Police

Local authorities need to be more active about passing on motor salvage operators for vetting. They aren't doing it!

Police

- **Confusion about who should conduct vetting**

There is confusion among police about which department should be responsible for vetting – whether it is the Criminal Records Bureau (CRB), the PNC unit, disclosure units, or local police officers.

Some feel that vetting should be conducted through the CRB but understand that the CRB does not currently have the capacity to do this.

I wrote some policy and procedures to go with it. But, we all knew this was a matter for the Criminal Records Bureau. However, we knew that the CRB was having problems providing this service as they couldn't deal with the sheer amount of low level work. Certainly they did not have the capacity to do this one year ago. So, the policy that I wrote said 'This is the work of the CRB but they do not have capacity. So there are two options: do nothing or do something in the interim to help'. We decided to go with the second option...but our decision making board took 20 seconds of deliberation to decide not to proceed on the basis that there is a national agreement between ACPO not to do work of the CRB. So that was the end of it.

Police

- **Lack of precise vetting guidance**

The most common barrier mentioned spontaneously by the police was the feeling that the guidance provided to them and to local authorities could be more specific. Some would like the guidance to police to be more 'definite' with very specific information about which checks to be carried out and to what detail.

This area is a bit wisby-washy. The guidance is not there, there is nothing from the Home Office or anyone else to guide us.

Police

Lack of guidance. Lack of communication about what we should be disclosing.

Police

One or two police feel that the legislation outlined in the act only refers to police officers:

The legislation only refers to police officers. It should also to include support staff authorised by Chief Police Officers to enable them to carry out vetting. However, this would involve a change in legislation!

Police

- **Provision of standardised vetting forms**

A few police mentioned that they would like standardised forms to be issued with respect to vetting setting out details such as need for middle name and maiden name, and so forth. Police feel these should be the same for each local authority. This is partly to counter the perception by police that local authorities do not understand the vetting procedure very well.

Forms from local authorities need to be completed properly.

Police

Need more detailed guidelines, standard forms. Guidance just [asks for] 'relevant information'. It needs to be more specific.

Police

Appendices

A. Pilot and Depth Interview Topic Guides

B. Questionnaires