

# **Review of policing of activities related to hunting**

**David Peet  
December 2024**

## Table of Contents

<b>Page</b>	<b>Contents</b>
1	Introduction
2	Background and Context
<b>Review Questions</b>	
4	Q.1 What were the circumstances that led to the force issuing a CPN, and were the correct standard processes followed before this was done?
6	Q.2 How was the decision to prepare a legal settlement made, at what level, and did the force sufficiently consider the wider implications of this decision - specifically in respect of trust and confidence?
8	Q.3 How did the force consider the PCC's declared interest as a member of the Countryside Alliance in their decision-making process?
10	Q.4 How was the incident managed (through Gold groups etc), and was this process sufficiently robust?
12	Q.5 What was the communications strategy and did the force anticipate the swell of interest and duration? How did the force plan to keep the PCC's office updated and was this approach sufficient?
15	Q.6 What was the legal basis for exempting the settlement agreement from publication and should consideration have been given for further information about the contents of the settlement agreement to be put in the public domain?
16	Q.7 Were procedures robust enough when dealing with reports of incidents related to fox hunting/ road safety/ ASB, how were they communicated to the police workforce and were they followed correctly? Were relevant teams within the force (for example the Rural Crime Team, Safer Neighbourhood Teams and the Operations and Communications Centre) sufficiently engaged in this process?
18	Q.8 How effectively and efficiently were the public and media informed about the process for reporting concerns about fox hunting/ road safety/ ASB, and was this communication sufficient?
20	Q.9 Did the force respond to enquiries and complaints in a timely manner, in a way that would have given the public confidence in their approach?
22	Q.10 Has the force conducted any internal reviews of their actions or implemented any changes to processes or wider learning?
14	Q11. How does the force intend, in moving forward, to engage with local communities to restore trust and confidence on these issues?
27	Summary of Recommendations
29	Appendix A – Terms of Reference
33	Appendix B – Force guidance on lawful hunt and lawful protest activity
34	Appendix C – College of Policing National Decision Model

## Introduction

- i When approaching this review there are a number of underlying facts that need to be considered:
  - The issue of hunting is a highly divisive one that elicits strong opinions on both sides.
  - The main legislation covering this issue is the Hunting Act 2004.
  - At the time of writing, it is illegal to hunt a mammal with a dog except for specific circumstances outlined in the 2004 Act. As foxes are mammals this includes the hunting of foxes.
  - At the time of writing, 'drag' and 'trail' hunting (where the hounds follow a scent trail laid down) are allowed.
  - The role of the police is to uphold the law as it currently stands. It is up to government to decide what is or isn't allowed.
  - Those opposed to hunting, in any form, have the right to protest peacefully, and this right is protected under the European Convention of Human Rights.
- ii This review has not been commissioned to look at the issue of current hunting legislation. It does not deal with the arguments either for or against hunting. It has been commissioned to look specifically at the Force's proposed use of a Community Protect Notice (CPN) to tackle reported incidents of anti-social behaviour by the Warwickshire Hunt; how matters were handled when the CPN was legally challenged; whether the Police and Crime Commissioner's (PCC) declared interest as a member of the Countryside Alliance influenced decision making; the Force's approach to dealing with reports of incidents and complaints; the communication strategy used and any learning identified moving forward.
- iii Concerns have been raised about the terms of reference for this review, with those opposed to any form of hunting asserting that they do not focus on the right issues. That said, those opposed to hunting have engaged with the review and their concerns have been noted.
- iv The review process has been fully supported by both the Force and the PCC/his office and beyond setting out the terms of reference for the review (See appendix A) there has been no direction given as to how the review is conducted, what is looked at or who is spoken to.
- v As a report this review will set out findings in relation to the eleven key questions raised within the Terms of Reference, highlighting areas of potential learning and making recommendations to both the PCC and Force about how this learning might be applied moving forward.

## Background and Context

- vi Warwickshire Police is responsible for the policing of an area of 764 square miles with a population of approximately 0.6 million residents. As a policing area it is a mix of urban, suburban and rural areas, each with specific crime and policing issues.
- vii In 2023/24 Warwickshire police dealt with 282,139 calls (an average of just over 770 calls per day) which generated 124,001 incidents.
- viii In line with the PCC's commitment to keeping rural communities safe, like many forces Warwickshire Police has a Rural Crime Team. The published aims of the team are to:
  - Engage with, understand and empower our rural communities
  - Build strong partnerships
  - Prevent and reduce crime
  - Put victims first

Rural crime is defined as:

Any crime or anti-social behaviour that takes place in a rural location\*

(\*Rural locations are defined by the Department for Environment, Food and Rural Affairs (DEFRA) output areas (excluding market towns), but including hamlets, isolated dwellings and village output areas.)

- ix Both the PCC and Force are signed up to the National Wildlife Crime Unit. The role of the Unit, as described in the Section 22a agreement between Chief Constables and PCCs, is to gather intelligence, information and evidence to compile a strategic assessment of wildlife crime in the UK through a number of means including (this is not an exhaustive list):
  - Gathering and analysing intelligence principally in support of the UK's wildlife crime priorities and the UK Tasking and Co-ordination Group;
  - Dissemination of this intelligence to law enforcement agencies;
  - Acting as a centre of expertise in relation to wildlife crime;
  - Providing specialist advice and coordination of wildlife crime investigations for Police Officers, the Crown Prosecutors and National Crime Agency
- x It should be noted at the time of writing foxhunting is not one of the seven identified current UK priorities. These are:
  - Badger Crime
  - Bat Crime
  - CITES Issues (the Convention on International Trade in Endangered Species of Wild Fauna and Flora)
  - Cyber enabled wildlife crime
  - Freshwater pearl mussels

- Poaching
  - Bird of prey crime
- xi Between October 2023 - October 2024, the Force identified 31 incidents with a reference to the word 'hunt'. This does not mean that this was the entirety of incidents that were reported relating to hunting or alleged anti-social behaviour, it merely reflects those incidents in which the term 'hunt' was used.
- xii Between September 2023 - October 2024, the PCC's office received 9 Freedom of information requests, all of which were responded to within the required 20 working days. In addition, between April 2023 - October 2024 the office received 20 enquiries regarding the hunt, all of which were responded to within 28 days.
- xiii Having reviewed the priorities for local Safer Neighbourhood Teams that cover some of the areas within which the Hunt operate the following themes were identified in the locally identified priorities:
- ASB
  - Vehicle Crime
  - Burglary
  - Illegal Parking (Southam)
  - ASB – youths around Long Itchington
  - Speeding
- xiv Whilst ASB has been identified as an issue, the exact nature of the ASB has not been described.
- xv As part of its approach to the management of legal hunting activity, and the activities of those opposed to it, the Force have issued guidance for the 2024/25 hunt season that is available via the Force's website. The guidance outlines expectations from both those engaging in lawful hunt activities and those lawfully protesting. (See appendix B)

## Review Questions

- 1. What were the circumstances that led to the force issuing a CPN, and were the correct standard processes followed before this was done?**
  - 1.1 Following reports of incidents surrounding the activity of the Warwickshire Hunt, including obstructions on highways what could be described as peripheral issues of potential anti-social behaviour were identified in relation to the activities of the hunt. (The term 'peripheral' is used there to indicate these were not issues in relation to the application of the Hunting Act 2004.)
  - 1.2 The Rural Crime Team looked to use powers given through the Anti Social Behaviour Crime and Policing Act 2014, namely a Community Protection Warning and Notice (CPW/CPN), to attempt to tackle the reported anti-social behaviour.
  - 1.3 The purpose of a CPN (taken from the Home Office's Statutory Guidance) is to stop a person aged 16 or over, business or organisation committing anti-social behaviour which spoils the community's quality of life. It can deal with a range of behaviours and can include requirements to prevent the anti-social behaviour from occurring again. The issuing of a notice must be prefaced by the issuing of a Community Protection Warning informing the perpetrator of the problem behaviour, requesting them to stop and the consequences of continuing. A breach is a criminal offence, and a fixed penalty notice of up to £100 may be issued if appropriate or a fine, up to level 4 (£2500) for individuals or a fine for business being imposed.
  - 1.4 The terms of a CPN can be appealed within 21 days of issue.
  - 1.5 As a policing power this is something that is considered to be at the lower end of the powers available and would normally be dealt with at the level of Inspector.
  - 1.6 The use of CPNs by the police for issues surrounding legal hunting activity remains fairly new. At the time of the development of the CPN, and its precursor CPW, in Warwickshire in 2022/23 this approach was trailblazing, with no other forces using these powers in this way. This should be borne in mind when considering the Force's decision making and any uncertainty over how this approach may be viewed should any legal challenge be made (which clearly it subsequently was). It should also be noted that the use of these powers have since been successfully applied in a number of other police force areas.
  - 1.7 A CPW was issued to the Warwickshire Hunt on 19<sup>th</sup> May 2022 and subsequently a CPN was issued on 14<sup>th</sup> December 2022.

- 1.8 As per their right of appeal, the Warwickshire Hunt lodged an appeal to the CPN resulting in a Gold Group being established in January 2023 as well as a Chief Inspector being brought in to oversee the work of the Rural Crime Team.
- 1.9 It was at the point of the appeal that Chief Officers report becoming aware of the issue. The fact that Chief Officers were not aware of the events that led to the issuing of the CPN is not, in and of itself, unusual. As previously stated CPWs and CPNs are lower-level interventions and would form part of what could be considered business as usual.
- 1.10 In this particular case it is worth noting, however, that it was identified that an individual involved in the issuing of the CPN had chosen not to brief up the chain of command. This fact is identified in the Gold Group minutes and the matter was referred to Professional Standards who assessed it as a performance, rather than a conduct matter, which would be dealt with via Practice Requiring Improvement measures. Had the terms and conditions of the CPW and subsequent CPN been better understood at an earlier stage it might have been possible to address some of the specific details that ultimately led to the appeal by The Warwickshire Hunt, and potentially preventing it.
- 1.11 Since this particular issue the Force has established a Safer Neighbour Teams Governance Board (which includes the work of the Rural Crime Team) to ensure that there is more robust governance and oversight of a range of local policing issues, one of which would be the use of CPWs and CPNs, and allow for escalation as required.
- 1.12 As 'Protecting Communities' (which include tackling anti-social behaviour) is one of the three pillars of the proposed Police and Crime Plan 2025-29 the PCC, and his office, may wish to explore how it can better understand the work of the SNT Governance Board and how it supports the three pillars, twelve local priorities and five foundational themes of the proposed plan.
- 1.13 The use of a CPW or CPN to tackle anti-social behaviour, from any party, relating to legal hunting activity remains very much 'on the table', a fact that has been raised in a number of discussions during this review. As the use of these powers to tackle issues in this area develop there will be learning available from other force areas who have either successfully, or unsuccessfully, adopted this approach and the Force should seek to understand this learning and apply it to any future use of these powers.

### **Recommendations**

- a. That the OPCC identifies appropriate ways to ensure it understands the work of the SNT Governance Board and how it supports the Police and Crime Plan priorities relating to local/neighbourhood policing.**
- b. Should the Force need to use a CPW or CPN in relation to lawful hunt or protest activity it should seek to understand lessons learned and identified best practice from other police force areas**

**2. How was the decision to prepare a legal settlement made, at what level, and did the force sufficiently consider the wider implications of this decision - specifically in respect of trust and confidence?**

- 2.1 Following the appeal lodged by the Hunt the terms of the CPN were not enforceable whilst the appeal process was being followed. In simple terms this related to the fact that mandatory requirements i.e. 'you must...' had no legal effect during the appeal.
- 2.2 Following instruction from the Court both sides were tasked with looking to see if they could narrow the issues in the case and/or seek to settle the litigation.
- 2.3 As part of its decision-making process the Force needed to consider the potential consequences of losing the legal challenge i.e. any reputational damage or financial loss, weighing this up against the impact of the issues the CPN had been written to deal with i.e. the alleged anti-social behaviour by the Hunt. That said, the principle aim of all of the work around this was clearly articulated as public safety, as would be expected.
- 2.4 Unsurprisingly, much of this work was undertaken by the legal representatives of the Force and the Hunt, but it is clear from the minutes of the Gold Group that the Force's legal team briefed into the Gold Group. It is also clear from the minutes that the issue of wider reputational risks, which would include trust and confidence, were also considered.
- 2.5 As the Force had chosen to use a Gold Group approach to deal with this issue, the ultimate decision to agree an approach would have sat with the Gold Group Commander, in this case an Assistant Chief Constable. This reflects where decision making would usually sit when using this particular approach to incident management.
- 2.6 When looking at the question of whether the Force sufficiently considered the wider implications of the decision, care needs to be taken about applying the benefit of 20:20 hindsight vision and needs to reflect on how decisions were made at the time. What has been apparent during this review is that decision making reflected the National Decision Model as described by the College of Policing (See appendix C). The approach was to address both the issues of the appeal to the CPN, but more importantly to address the issues that the CPN had been written to address in the first place and ensure that there was a workable solution in place to support the police's work in relation to legal



hunting activities and any related protest. It is also evident that community impact was a consideration.

- 2.7 What has been made clear in conversations that formed part of this review was that the Force recognises that things could have been done differently and that they hadn't fully appreciated how this relatively minor issue, when compared to the overall threats and risks the Force is facing, would escalate. (See part 5 of this review.)

### **3 How did the force consider the PCCs declared interest as a member of the Countryside Alliance in their decision-making process?**

3.1 As is referenced in the question, the PCC has a declared interest as a member of the Countryside Alliance. A declaration is made in his May 2024 statement, available online via the PCC's website, where it states:

*Are you a member of an external organisation? Yes. The Conservative Party, Countryside Alliance*

This membership was originally declared on 17<sup>th</sup> June 2016 in his Register of Interests along with his (then) positions as:

- Chair of the West Midlands Reserve Forces and Cadets Association
- Chair of the Warwickshire Army Benevolent Fund
- President of the Stratford-upon-Avon Conservative Association.

3.2 Concerns have been voiced in certain quarters that membership may have caused a conflict of interests as the Countryside Alliance campaigns, amongst other things, on hunting. It should, however, be recognised that they also campaign on a range of other issues affecting rural communities and as PCC for an area with significant rural communities it is understandable that they would be identified as one of many stakeholders with whom the PCC would engage.

3.3 The suggestion has been made that the PCC's membership may have been taken into consideration by the Force as part of their decision-making processes. Whilst no evidence of PCC involvement in decision making has been found it has been suggested that once the leadership of Warwickshire Police became aware of the PCC's membership of the Countryside Alliance steps were taken to actively put clear water between him (the PCC) and the Force's activity to try and prevent any allegations of inappropriate involvement/influence. The PCC, and his office, were not part of the Gold Group structure that was set up to look at the issue of the CPN and subsequent agreement/protocol with the Hunt, either at its inception or later in the process as the issue developed.

3.4 Had the PCC sought to bring undue influence upon the Force's decision-making he would, in fact, have risked crossing an important line. The Policing Protocol Order 2023 (and its 2011 predecessor) makes it explicitly clear that the PCC cannot become involved in operational policing and must respect and maintain the Chief Constable's operational independence. This commitment to operational independence is further confirmed in the Oath of Office taken by the PCC in May 2024 which includes the statement:

*'I will not interfere with the operational independence of all police officers.'*

- 3.5 The PCC should be assured that no evidence has been found that his declared membership of the Countryside Alliance influenced the Force's decision-making, and that there is no evidence of breaching the operational independence of the Chief Constable, or the Force.
- 3.6 Whilst not part of the terms of reference of this review it has been noted that whilst the PCC's declared outside interests are easily identifiable and up to date, the same cannot be said for the Force. The most up to date published list of Business Interests on the Force website, at the time of writing, is dated August 2021. The Force may wish to look to review this and publish an up to date list.

### ***Recommendations***

- c. The Force consider reviewing and updating its published list of Business Interests***

#### **4. How was the incident managed (through Gold groups etc), and was this process sufficiently robust?**

- 4.1 Following the appeal launched by the Hunt into the issuing of the CPN a Gold Group was established under the working title of Op Gattaca. The first meeting having taken place on 9<sup>th</sup> January 2023.
- 4.2 Membership of the group included the chief officer lead, representatives from local policing, professional standards, corporate communications and legal services. At this stage this would feel like the right people around the table, though as matters developed there is an argument that could be made for the inclusion of a representative from Contact Management (“the control room”) as well as the potential for greater engagement with the PCC’s office. (NB The suggestion would be possible engagement/an invitation to attend for the PCC’s office, rather than the PCC or DPCC themselves, as happens in other police force areas.)
- 4.3 Having reviewed the minutes of the Gold Group it can be seen that the meeting was focused and addressed both current and emerging issues. It has not, however, been possible to locate a terms of reference for the group, and there is no evidence, therefore, that they were ever reviewed. Whilst this may be a simple administrative oversight, the Force should consider ensuring there is a document produced that defines the purpose and rationale for convening a Gold Group and keeping that document under review as an issue develops, to ensure activity is focussed in the right areas and the right people are sat around the table.
- 4.4 As the meeting was established to manage an ongoing situation it is clear from the minutes that this rightly remained the primary focus. It might, however, be suggested that the inclusion of representation from the PCC’s office may have helped ensure the wider impact of decisions taken were understood and any mitigation required put in place.
- 4.5 An additional observation would be as the situation developed, and following the move from the agreement with the Hunt to the current policy, as advertised on the Force’s website, it may have been appropriate to extend the list of attendees to include representatives from Contact Management. This would ensure the consistency of messaging in terms of approach, reporting of incidents etc and ensured that those taking 101 calls were properly briefed on how to respond. Such a move would have helped provide the best/most appropriate support to the public at the first point of contact when raising concerns i.e. when phoning 101 as requested. It might have also assisted in resource planning when it was known that there was planned activity.
- 4.6 It is understood that the PCC’s office will in future be informed of all Gold Groups running and this can only be seen as a positive step. It will not always be appropriate for representatives from the office to attend meetings, but they

should feel able to ask questions about progress and ask to be in attendance. Clearly the ultimate decision on attendance needs to remain with the senior officer running the meeting but the benefits having an OPCC representative around the table can bring as a critical friend and in terms of discharging the PCC's responsibilities around oversight and assurance should not be underestimated.

### **Recommendations**

- d. That the Force ensure that all Gold Groups have agreed Terms of Reference that are reviewed as a standing agenda item, along with the list of invitees/attendees***
- e. That the PCC uses the list of Gold Groups running supplied by the Force to inform ongoing oversight and assurance work through his meetings with the Chief Constable, the Governance and Scrutiny Board arrangements and any other appropriate fora identified***
- f. That a representative of the OPCC attends Gold Groups (as appropriate and agreed with the Force). The OPCC should also agree internally how the PCC/DPCC will be briefed on those Gold Groups attended***

**5. What was the communications strategy and did the force anticipate the swell of interest and duration? How did the force plan to keep the PCC's office updated and was this approach sufficient?**

- 5.1 In looking at this matter it may be useful to look at whether the Force anticipated the swell of interest and duration first.
- 5.2 It would appear that the simple answer to that question is no, they didn't. Even though this was a very specific issue, relating to relatively low levels of reports or incidents, and not an identified threat or risk priority area for the Force, it did, and continues to, generate high levels of interest in some areas of the media, wider social media circles and beyond.
- 5.3 It is important to remember when looking at this issue that the communications strategy needed to be mindful of the fact that there were ongoing legal proceedings when the Hunt's appeal was lodged and so care was needed about what was communicated and how so as not to impact on them.
- 5.4 It would appear that the Force's view was to put out a simple statement that reflected the facts of the matter i.e. that a settlement between the Police and Warwickshire Hunt had been agreed, and that this would allow the Force to achieve the broad aims of the CPN.
- 5.5 In an attempt to try and prevent matters from escalating the Force adopted a media line and stuck to it. The Force also determined not to be proactive with the media in relation to the CPN. In hindsight this may not have been the best approach. As the issue developed and gained momentum it may have been better to take a more proactive approach, though this is caveated with the fact that this is said with the benefit of 20:20 hindsight vision.
- 5.6 Having reviewed the minutes of Op Gattaca it is clear that representatives from the Force's Communications Team were present and actively contributed in the meetings. What is less clear is how loud their voice was and how 'heard' they were.
- 5.7 In terms of how the Force updated the PCC, and his office, it would appear that this was done as part of the regular PCC/Chief Constable meetings. This view is, however, only based on anecdotal evidence as the notes of these meetings, available via the PCC's website, are very light touch (in all they cover) and where references to the Hunt or associated issues are raised only a brief note is recorded. It is therefore difficult to assess the sufficiency of these updates.
- 5.8 Clearly the PCC and Chief Constable need to have an opportunity to have an open and free conversation, and there will be times when sensitive

information is discussed that is not suitable for wider circulation or publication. Any published minutes will need to be mindful of this. It is good to note that the terms of reference for these particular meetings were reviewed and updated in May 2024.

- 5.9 In addition to the weekly PCC/Chief Constable weekly meetings, the PCC also holds a monthly wider meeting (previously the Governance and Performance Board, now the Governance and Scrutiny Board). It would appear from the minutes of those meetings that more in-depth discussions took place, and the nature of these discussed published, and yet no reference to the issues relating to the CPN, the subsequent agreement, or the wider issue attempting to be resolved i.e. alleged anti-social behaviour relating to legal hunting activity is mentioned. It is of particular interest that there was a specific focus on Rural Crime and the work of the Rural Crime Team at the meeting on 1<sup>st</sup> August 2023 and it would seem, from the minutes of this meetings, that matters relating to hunting did not form a part of the discussion. This feels like a missed opportunity to demonstrate how the PCC was alive to the issue and provide a level of public assurance that they were maintaining oversight of the issue.
- 5.10 A positive development has been the OPCC's move to the new Governance and Scrutiny Board. Whilst this is still in its early stages this approach should provide a more robust approach to scrutiny and holding to account and specifically addresses issues of transparency to help provide the public with the assurance that the PCC is discharging his responsibilities. It has clearly defined terms of reference, which are available via the PCC's website.
- 5.10 As previously referenced a potential solution could have been the PCC's office being represented as part of the Op Gattaca Gold Group. Whilst this is highlighted as a recommendation it is noted that progress has already been made in this area and the PCC/his office are now aware of Gold Groups running and able to request a seat at the table.
- 5.11 Based on the available evidence it has therefore not been possible to confirm if the PCC, or his office's, approach to being briefed on this issue was sufficiently robust. As a key responsibility of any PCC is to hold the police, through the Chief Constable, to account this feels like a possible missed opportunity and an area of learning for the PCC's office.

## RECOMMENDATIONS

- g. That the Force considers the learning from their experience in this situation and keeps their media strategy/decisions about proactivity under review to prevent matters from escalating***
- h. That the Force's Communications Team review their role within Gold Groups and ensure that they are robust enough with their professional advice to support the Force and retain public trust and confidence***
- i. That the PCC's office keeps the terms of reference for both regular meetings with the Chief Constable, and the newly established***

***Governance and Scrutiny Board, under review to ensure they contribute towards the robust support and challenge of the Force***

- j. That the PCC's office considers how and when it will brief the PCC on issues raised at Gold Groups***
- k. That the PCC and his Senior Team remain mindful of how all activity contributes toward the PCC's function of 'holding to account'***



**6. What was the legal basis for exempting the settlement agreement from publication and should consideration have been given for further information about the contents of the settlement agreement to be put in the public domain?**

6.1 Following the challenge by the Warwickshire Hunt of the CPN put in place by the Police, both parties were instructed by the Courts to see if they could narrow the issues in the case and/or seek to settle the litigation. The result of those discussions was the settlement agreement. It should be noted that the settlement agreement and its disclosure remain subject to legal processes and so care needs to be taken as to what can be said as part of this review.

6.2 Following freedom of information requests for disclosure of the settlement agreement an exemption under Section 32(1)(b) of the Freedom of Information Act 2000 was applied by the Force. This exemption is described in the Act as information relating to *Court Records etc.*

*(1) Information held by a public authority is exempt information if it is held only by virtue of being contained in—*

*(b) any document served upon, or by, a public authority for the purposes of proceedings in a particular cause or matter, or*

6.3 The application of this exemption was appealed and considered by the Information Commissioner's Office and a decision was given by the ICO on 16<sup>th</sup> July 2024 (ref IC-296593-L5R6) that confirmed that Warwickshire Police were entitled to apply an exemption under s32(1)(b) of the Act and that no further action was required. It is understood that this decision is now subject to a further appeal, hence care being taken of how the matter is discussed in this review.

6.4 Whilst transparency in decision making is a key consideration, it should also be recognised that public bodies should, in certain circumstances, be able to have discussions and enter into agreements without having to disclose the nature and content of those discussions/agreements, hence the existence of exemptions within the Act. It should be noted that an exemption under s.32 is considered an absolute exemption and therefore there is no requirement to apply any public interest test. If the authority, in this case Warwickshire Police, consider the exemption is engaged they can apply it without further qualification.

6.5 For the reasons outlined above the PCC can be assured that there was a sound legal basis for the application of the exemption, notwithstanding any future outcome of appeals regarding the ICO's decision.

6.6 There is, however, a wider consideration of how this was communicated and the impact of the approach adopted.

**7. Were procedures robust enough when dealing with reports of incidents related to fox hunting/ road safety/ ASB, how were they communicated to the police workforce and were they followed correctly? Were relevant teams within the force (for example the Rural Crime Team, Safer Neighbourhood Teams and the Operations and Communications Centre) sufficiently engaged in this process?**

7.1 In addition to Op Gattaca the Force also has an ongoing policing operation called Op Expect which deals with the day to day management of this issue. (It should be noted at this point there is also a more recent development with the development of Op Ordino, which is covered in part 11 of this review, but this section of the review focuses on how the Force dealt with, rather than proposes to deal with, these issues.)

7.2 Information about Op Expect is available to those working within Warwickshire Police via the Force's Intranet. This reflects how information about other policing issues would normally be accessible to officers and staff.

7.3 Op Expect has the following overall aim:

To work in partnership to keep our communities safe ensuring, as far as possible, a balancing of the rights of people participating in trail hunts, monitoring or pretesting against illegal hunting or communities going about their normal business.

This aim is supported by the following objectives:

- Maintain public safety
- Facilitate legal hunting activities, monitoring & peaceful protests
- Prevent and deter crime and disorder
- Minimise disruption
- Maintain business and usual
- (Facilitate effective) Engagement
- Maintain public confidence
- Return to normality (should disruption occur)
- Identify and implement learning

7.4 The approach is described as being underpinned by the values of Warwickshire Police, in line with the Code of Ethics with a focus on impartiality, transparency, integrity and public service.

7.5 Whilst there would appear to be a good understanding of the existence of Op Expect amongst those spoken to (i.e. more senior officers) it is hard to say how well known it is within the wider workforce. This is not, of itself, unusual as there will be numerous operations, pieces of guidance etc. running at any one

time and not everyone will need to know about them. That said, with the significant interest in this particular area of police business it might seem prudent to ensure that all officers are aware of its existence and where to find out information should they be asked about it as part of their day to day duties. (This is not to suggest that they should be making public statements on it, rather have a basic awareness of how the Force is looking to deal with this particular subject.)

- 7.6 Conversations with representatives of Contact Management have identified that there would be opportunities to ensure those working within this area were made aware of the Force's approach both before the start of a hunt season and also through team briefings, should there be any notable events taking place e.g. there could be something included in a briefing before any meets around Christmas, Boxing Day or New Year's Day. It would, however, appear that this opportunity may have been missed and the Force should consider using the internal briefing processes within Contact Management to ensure call handlers are aware of notable events and/or where to find relevant information (such as Op Ordino) on Force systems.
- 7.7 The Force's SNT Governance Board also presents an opportunity for information and reminders of procedures to be disseminated to those who needed to understand the Force's current approach more generally.
- 7.8 The existence of Op Expect/Op Ordino should be seen as a positive thing as, if used correctly, it should allow the Force to better understand the scale of any issues, identify and trends/themes and use the data it holds to help inform resource planning, as well as developing its understanding of any impact on local communities.
- 7.9 What has not been clear is what engagement, if any, there has been with wider partners. This is an area which both the Force and PCC's office may wish to do some further work. An example of this would be how local Community Safety Partnerships (CSPs) were engaged. Whilst much of the work of CSPs nationally has focussed traditionally on anti-social behaviour in urban and suburban areas, as this particular issue relates to alleged anti-social behaviour linked to legal hunting activity, there may be a relevance for CSPs in which hunting activity takes place. As a statutory partner in CSPs, the Police would be able to bring this matter to the table to see if there were any opportunities for wider partnership involvement. Whilst this will not 'solve' the problem, it is certainly a line of enquiry that could be explored.
- 7.10 As some of the complaints levelled against the Hunt relate to the use of the roads network there should also be active engagement with those with responsibilities for highways i.e. Warwickshire County Council.

- 8. How effectively and efficiently were the public and media informed about the process for reporting concerns about fox hunting/ road safety/ ASB, and was this communication sufficient?**
- 8.1 For the Hunting Season 2024/25 the Force have published guidance for lawful hunt and lawful protect activities on their website. The guidance sets out expected behaviours and supports the wider statement on Fox Hunting that is also published within the Rural Crime Team pages of the Force website.
- 8.2 What is less clear from either the statement on fox hunting, or the guidance, is exactly how the Force would like to receive reports. Whilst media statements (the most recent being issued on 24.10.24) may have suggested that all reports should go via the 101 phone number, or via the online reporting portal, this is not made explicitly clear in either the statement or guidance.
- 8.3 As many of the reports received by the Force have related to alleged anti-social behaviour surrounding hunting activity, rather than offences under the Hunting Act, the Force has identified that they would be best dealt with by teams other than the Rural Crime Team. The use of 101 or online reporting tools will allow an assessment to take place to ensure that the right people are able to deal with the report in the most appropriate way.
- 8.4 There is also advice on how to report an illegal hunting crime available via the website, but again the messaging here is not exactly the same, suggesting either reporting online or via 999 if the crime is happening or someone is in danger. (It also offers the option of reporting anonymously via Crimestoppers.) Having reviewed a number of police websites it would appear that the content of this particular page is a standard format mirrored across those viewed.
- 8.5 It is understandable that these subtle differences in messaging may lead to confusion for those trying to report incidents to the police, and it also will frustrate how the Force is able to best respond to them. The Force should therefore look to reviewing their messages to ensure simplicity and consistency in how they are asking the public to report in concerns and incidents and provide simple and explicit advice on how the public should raise concerns.
- 8.6 An area of concern that has been raised is the Force's decision to use Operation Snap to deal with issues of anti-social behaviour relating to road use. Op Snap is described on the Force's website as an opportunity to '*report and submit digital footage showing potential moving traffic offences*'. The website goes on to describe what this might include – dangerous driving, carelessly overtaking over a solid white line, using a mobile phone whilst driving, ignoring traffic lights or dangerous driving around other road users, such a horse riders or cyclists (this is not an exhaustive list). It suggests that submissions should only be made regarding one offending vehicle at a time, requiring separate reports if an incident involves multiple vehicles. Whilst this

would appear to be the correct approach for dealing with any vehicles involved in dangerous road use, the concerns voiced point out that this approach does not include the opportunity to report if horses or hounds are those allegedly causing difficulties.

### ***Recommendations***

- 1. The Force should review all its online references to reporting incidents relating to hunting and associated anti-social behaviour etc to ensure clear and explicit advice on how the public should contact them***

**9. Did the force respond to enquiries and complaints in a timely manner, in a way that would have given the public confidence in their approach?**

- 9.1 As has previously been referenced, the Force did not appreciate the level of interest this issue would generate and as such its response to enquiries and complaints were not as timely as they should have been.
- 9.2 In relation to Freedom of Information Requests it has been acknowledged that there were internal difficulties in getting these responded to within the prescribed timeframes and delays were highlighted by the Information Commissioner's Office in some of its findings when contacted. This issue has been acknowledged in Force and steps have been taken to ensure compliance with timeliness requirements.
- 9.3 As one of the key responsibilities of a PCC is to ensure the effectiveness and efficiency of the police, and as complaints handling will form a part of this, the PCC should satisfy himself that these issues of timeliness are being addressed and that complaints and enquiries are being dealt with appropriately.
- 9.4 Having looked at some specific issues raised, concerns have been identified with how the Force has responded to some reports. When a report of tracking devices being located on an individual's vehicle was made, the Force appears not to have kept the individual updated on progress on their investigation, with the complainant repeatedly having to contact them to find out what was going on. Whilst some of the delay may have related to the need to get technical analysis undertaken by a third party, it should be recognised that keeping the member of the public updated on progress and providing reassurance that the matter had not been forgotten is clearly within the Force's gift.
- 9.5 The specific case looked at also raised wider questions about how the Force responds to reports of potential stalking/harassment, which clearly falls outside of this review, but this concern has been raised with the PCC's office prior to the completion of this review. It is understood that they (the PCC's office), and the Force, are alive to this issue and work is underway, having set up a specific working group to look at this issue.
- 9.6 A lack of timeliness in responding to contact from the public can clearly have a detrimental effect on public trust and confidence, as well as exposing the Force to unnecessary risk in relation to non-compliance with obligations such as response times to FOI requests. Whilst assurances have been given that the Force is aware of the issue, and remedies have been put in place, the Force should remain vigilant in ensuring that it keeps on top of timeliness. Where there are going to be delays, this should be communicated to ensure that members of the public are kept informed of progress on matters and are given a level of reassurance that matters haven't been forgotten or aren't actually being progressed.

- 9.7 As part of its approach moving forward the Force have identified single points of contact within the Force for both those involved in legal hunting activity and those opposed to it. Whilst it is not the responsibility of these officers to deal with specific reports of incidents or circumvent the Force's agreed approach to handling such reports, this approach should help ensure lines of communication are kept open for more general conversations and for broader concerns to be raised. In order to prevent any confusion, the Force may wish to consider describing the role of single point of contact to help manage expectations and prevent confusion about what needs to be reported to whom.

### ***Recommendations***

- m. The Force should seek to assure itself that all outstanding enquiries and complaints are being dealt with in a timely manner and that those raising matters are being kept informed of progress.**
- n. The Force may use the learning from this part of the review as an opportunity to remind officers and staff of the importance of keeping people informed.**
- o. The Force may wish to clarify the role of single point of contact to avoid any confusion about what these officers are responsible for, what lies within their remit and to help manage expectations.**
- p. The PCC should, through his office and the Governance and Scrutiny Board, actively monitor and seek assurance that the Force's actions to address timeliness are being effective and improvements are being made and sustained.**

## **10. Has the force conducted any internal reviews of their actions or implemented any changes to processes or wider learning?**

- 10.1 It is understood that considerations were made at the time to look to the College of Policing to identify another police force to undertake a Peer Review of Warwickshire Police's approach. However, the PCC's decision and subsequent announcement of a review meant that this work was not progressed. The Force may wish to consider if a peer-review of how it has handled specific reports of incidents would add value and help further should any further learning be identified.
- 10.2 Changes have clearly been made as the previous agreement with the Warwickshire Hunt has now ended and the new publicised approach has been adopted by the Force. (It should be noted that whilst the previous agreement dealt solely with the Warwickshire Hunt, the new approach applies to all currently legal hunting activity in the County.)
- 10.3 Learning is an identified specific objective of Op Expect. Providing Op Expect is working as planned this should be the mechanism to identify and disseminate learning. As part of his governance role the PCC has the opportunity to seek assurance around any learning identified and how that learning is being implemented, and this should form part of the work of the Governance and Scrutiny Board.
- 10.4 Following some initial nervousness about the review commissioned by the PCC, the Force's response has been positive and they have actively engaged with it at all levels. It has been clear during all discussions that there is always learning and that the Force are keen to identify this and use their experiences in this situation to inform how they work moving forward.
- 10.5 The introduction of a Safer Neighbourhood Teams Governance Board gives the opportunity for better oversight and understanding of use of CPW/CPNs with an opportunity for escalation of potentially contentious use of these powers at an earlier stage and consideration of potential impact on wider public trust and confidence.
- 10.6 Having reviewed activity described on other police websites, it could assist the Force in its planning and delivery if it were to undertake a partnership review event following each hunt season to maintain engagement and identify what has worked and what needs reviewing.

### **Recommendations**

- q. That the Force considers if there would be any value to undertaking the peer-review process that had previously been considered, in particular relating to its handling of specific reports of crimes/incidents.**
- r. That the PCC adds to the forward plan an oversight agenda item on the Governance and Scrutiny Board regarding learning identified as part of Op Expect at the end of each hunt season.**



- s. That the Force considers holding engagement events with both those involved in legal hunting activity and those opposed to it to identify any learning at the end of each hunt season.***

## **11. How does the force intend, in moving forward, to engage with local communities to restore trust and confidence on these issues?**

11.1 As has previously been referenced, the Force has identified an individual at Inspector rank to head up the Rural Crime Team. Part of their work to date has to be consolidate the various policing operations and approaches and create a new approach, with a new operational name (Op Ordino) which outlines the approach to hunt event policing.

11.2 The stated aims of Op Ordino include:

- Prevent hunting offences taking place
- Reduce the potential impact of ASB/disruption to the highway
- Prevent potential public disorder/ASB
- Help with management of lawful protest when this occurs, in line with the ECHR.

11.3 Whilst the intention of Op Ordino is not to directly 'police' hunting events, it is intended that this approach will help with managing any community tensions, public order concerns, traffic management issues or complaints.

11.4 The potential for the issuing of further CPWs or CPNs remains.

11.5 Helpfully, after each event attended a feedback template will be produced, reviewed and saved – allowing for both a real-time review of the current approach and also supporting an annual review following each hunt season.

11.6 An 'Op Ordino' tag will be used within the Force Control Room for all hunt related incidents, again this will greatly facilitate oversight and review of deployment, investigation, response and crime recording. This approach will also assist in identifying and responding to any emerging trends that might have been missed when looking at individual incidents in isolation.

11.7 In addition to Op Ordino, a Problem Solving Plan approach is being adopted focussing on any ASB-related issues. This approach should be particularly welcomed as it is reports based around ASB, rather than specific violations of the Hunting Act, that make up the majority of contact around this issue. The College of Policing described this approach (also known as problem-orientated policing) as:

- Identification of a specific problem
- Thorough analysis to understand the problem
- Development of a tailored response
- Assessment of the effects of the response

The College goes on to explain the use of what it calls a 'SARA' model. This is made up for four stages:

- Scanning – identifying and prioritising potential crime and disorder problems
  - Analysis – analysis of potential problems by gather information and intelligence to identify underlying causes
  - Response – development and implementation of tailored activities to address the casus of the problem identified in the analysis stage
  - Assessment – measurement of the impact of the response, to test if it has had the desired effect and to make changes to the response if required.
- 11.8 To support engagement Single Point Of Contact (SPOC) officers have been identified. As was highlighted at paragraph 9.7 of this review, the Force may wish to consider describing the responsibilities and duties of this SPOC role to prevent any confusion and help manage expectations of what these officers are there to do.
- 11.9 All of this work will be publicised for awareness to the wider organisation of the approach to hunting related issues via the Force’s internal communications channels.
- 11.10 Whilst the way in which a force choses to deal with a particular issue is clearly an operational one, a PCC is quite within the scope of their responsibilities to seek assurance that the approach used is delivering the intended outcome. As per previous recommendations made, the PCC should consider adding the Force’s approach to managing both offences under the Hunting Act and ASB related to legal hunting activity to the forward plan of his Governance and Scrutiny Plan. Such an addition would help provide assurance to the public of the effectiveness, or otherwise, of the approach the Force are taking.
- 11.11 Whilst it is still very much ‘early days’ with this new approach, it does feel like something of a step change in how this issue is being handled. This should hopefully help with the restoration of public trust and confidence, though it should be recognised that for some there would need to be a more fundamental review and amendments to (current) hunting legislation before that confidence can be restored. Time will, of course, be required to understand if this approach is working, and for the assessment stages of the ‘SARA’ model to be undertaken, including any necessary changes or tweaks to the approach.
- 11.12 Review sessions with both those engaged in legal hunting activity and those opposed to it should be undertaken at the end of the season (end of March 2025) and again prior to the commencement of the 2025/26 season.

### ***Recommendations***

- o. **The Force may wish to clarify the role of single point of contact to avoid any confusion about what these officers are responsible for, what lies within their remit and to help manage expectations.**

- r. That the PCC adds to the forward plan an oversight agenda item on the Governance and Scrutiny Board regarding learning identified as part of Op Expect at the end of each hunt season.***
- s. That the Force holds engagement events with both those involved in legal hunting activity and those opposed to it to identify any learning at the end of each hunt season.***

## Summary of Recommendations

- a. *That the OPCC identifies appropriate ways to ensure it understands the work of the SNT Governance Board and how it supports the Police and Crime Plan priorities relating to local/neighbourhood policing.*
- b. *Should the Force need to use a CPW or CPN in relation to lawful hunt or protest activity it should seek to understand lessons learned and identified best practice from other police force areas.*
- c. *The Force consider reviewing and updating its published list of Business Interests.*
- d. *That the Force ensure that all Gold Groups have agreed Terms of Reference that are reviewed as a standing agenda item, along with the list of invitees/attendees*
- e. *That the PCC uses the list of Gold Groups running supplied by the Force to inform ongoing oversight and assurance work through his meetings with the Chief Constable, the Governance and Scrutiny Board arrangements and any other appropriate fora identified*
- f. *That a representative of the OPCC attends Gold Groups (as appropriate and agreed with the Force). The OPCC should also agree internally how the PCC/DPCC will be briefed on those Gold Groups attended*
- g. *That the Force considers the learning from their experience in this situation and keeps their media strategy/decisions about proactivity under review to prevent matters from escalating*
- h. *That the Force's Communications Team review their role within Gold Groups and ensure that they are robust enough with their professional advice to support the Force and retain public trust and confidence*
- i. *That the PCC's office keeps the terms of reference for both regular meetings with the Chief Constable, and the newly established Governance and Scrutiny Board, under review to ensure they contribute towards the robust support and challenge of the Force*
- j. *That the PCC's office considers how and when it will brief the PCC on issues raised at Gold Groups*
- k. *That the PCC and his Senior Team remain mindful of how all activity contributes toward the PCC's function of 'holding to account'*
- l. *The Force should review all its online references to reporting incidents relating to hunting and associated anti-social behaviour etc to ensure clear and explicit advice on how the public should contact them.*

- m. The Force should seek to assure itself that all outstanding enquiries and complaints are being dealt with in a timely manner and that those raising matters are being kept informed of progress.*
- n. The Force may use the learning from this part of the review as an opportunity to remind officers and staff of the importance of keeping people informed.*
- o. The Force may wish to clarify the role of single point of contact to avoid any confusion about what these officers are responsible for, what lies within their remit and to help manage expectations.*
- p. The PCC should, through his office and the Governance and Scrutiny Board, actively monitor and seek assurance that the Force's actions to address timeliness are being effective and improvements are being made and sustained.*
- q. That the Force considers if there would be any value to undertaking the peer-review process that had previously been considered, in particular relating to its handling of specific reports of crimes/incidents.*
- r. That the PCC adds to the forward plan an oversight agenda item on the Governance and Scrutiny Board regarding learning identified as part of Op Expect at the end of each hunt season.*
- s. That the Force considers holding engagement events with both those involved in legal hunting activity and those opposed to it to identify any learning at the end of each hunt season.*

## APPENDIX A



# Terms of Reference: Review of policing of activities related to hunting

## Introduction

This Terms of Reference document outlines the approach agreed by the Police and Crime Commissioner to commission an independent report to consider actions by the force in response to ASB, road safety and crime reporting issues arising over the course of the 2022-2023 and 2023-2024 hunting seasons.

## Background

The review will cover the period from December 2022 onwards, when Warwickshire police issued a Community Protection Notice to the Warwickshire Hunt for anti-social behaviour and disregard for road safety. In August 2023 the CPN was formally withdrawn and a settlement agreed, which became known as a Protocol. The force stated that this document cannot be published and was exempt under section 32 of the Freedom of Information Act 2000 (relating to Court Records).

The acts of proposing a CPN and then subsequently withdrawing it to be replaced with a legal settlement became subject of criticism, and interested members of the public and stakeholder groups raised concerns, including about the lack of transparency in the process. These concerns were raised with both the force and the OPCC, and a significant number of requests for the “Protocol” have been

received by both organisations, along with a number of enquires and complaint submissions and other requests under the Freedom of Information Act. The PCC has also been questioned about his role in this matter at Police and Crime Panel Meetings on 21 September 2023, 22 November 2023 and 20 June 2024 and has received queries about operational involvement and his approach to holding the Chief Constable to account on this matter.

In March 2024 the PCC committed, should he be re-elected, “to an independent report to look at the issuing of the protocol and make recommendations to the force on how it can move forward to fully restore public confidence.” This report will form part of the PCC’s statutory function to Hold to Account the Chief Constable, as set out in section 1 (7, a, b & 8, a-h) of the Police Reform and Social Responsibility Act, and 17 (c) of the Policing Protocol 2023.

In the meantime the force have ceased the protocol and announced a planned Code of Behaviour, which will be prepared and published in advance of the 2024 hunting season.

## Objectives

The review will serve as a mechanism to scrutinise Warwickshire Police's decisionmaking process, approach to communications, and all related actions to determine if they were reasonable and proportionate under the circumstances, and will identify if there are lessons to be learnt for the future. It aims to provide the PCC and the public with an informed insight into the effectiveness of Warwickshire Police’s responses to matters raised associated with hunting. It should identify good and effective practices, as well as highlight any operational or organisational learnings for policing.

The review seeks to understand:

1. What were the circumstances that led to the force issuing a CPN, and were the correct standard processes followed before this was done?
2. How was the decision to prepare a legal settlement made, at what level, and did the force sufficiently consider the wider implications of this decision - specifically in respect of trust and confidence?
3. How did the force consider the PCCs declared interest as a member of the Countryside Alliance in their decision-making process?
4. How was the incident managed (through Gold groups etc), and was this process sufficiently robust?
5. What was the communications strategy and did the force anticipate the swell of interest and duration? How did the force plan to keep the PCC's office updated and was this approach sufficient?
6. What was the legal basis for exempting the settlement agreement from publication and should consideration have been given for further information about the contents of the settlement agreement to be put in the public domain?



7. Were procedures robust enough when dealing with reports of incidents related to fox hunting/ road safety/ ASB, how were they communicated to the police workforce and were they followed correctly? Were relevant teams within the force (for example the Rural Crime Team, Safer Neighbourhood Teams and the Operations and Communications Centre) sufficiently engaged in this process?
8. How effectively and efficiently were the public and media informed about the process for reporting concerns about fox hunting/ road safety/ ASB, and was this communication sufficient?
9. Did the force respond to enquiries and complaints in a timely manner, in a way that would have given the public confidence in their approach?
10. Has the force conducted any internal reviews of their actions or implemented any changes to processes or wider learning?
11. How does the force intend, in moving forward, to engage with local communities to restore trust and confidence on these issues?

## Appointment and Approach

The following guiding principles and quality assurance indicators will support the approach to the review. The reviewer should:

- Produce a high-quality report that is accessible, that is true to the terms of reference, and that sets out lessons looking forward and actions for improvement.
- Demonstrate an evidence-based approach, consistency, thoroughness and clarity of purpose.
- Produce a report that resonates with – and meets the reasonable expectations of – our audiences, ensure that the report’s tone of voice is appropriate to the subject matter and the context.

All parties will approach this review, bearing in mind the expectations stated in the Policing Protocol 2023, including the following:

- All will conduct themselves in line with the Nolan Principles, Codes of Conduct and Code of Ethics.
- Parties will ensure they are sufficiently briefed and be prepared to operate openly and transparently; the Chief Constable will share information in the line with the expectations of s36 of the Police Reform and Social Responsibility Act 2011.
- The PCC shall ensure that all persons appointed to work on the report shall be suitably qualified, experienced, and trained and subject to appropriate confidentiality agreements consistent with the provisions of these Terms of Reference.
- The persons appointed can draw upon any necessary and relevant nationally recognised expertise available to support the review.

- The PCC will be responsible for any persons appointed in relation to the independent review and will be responsible for their conduct in relation to the independent review.
- The persons appointed will take part, on an agreed basis, in a public release of the report and recommendations including participation in a press conference or similar event if required and the terms of these Terms of reference shall apply to any such participation as they do to the conduct of the review.
- Should the appointed reviewers identify any issues of individual conduct or performance, these must be promptly reported to the appropriate authority. Additionally, if any potentially criminal matters are detected, these will be immediately communicated to Warwickshire Police.

## Review

The PCC and the persons appointed agree to work towards the production of the report and recommendations in Autumn 2024.

A public summary of the report should be prepared alongside the substantive document. This will be published on the OPCC Website, alongside the potential to engage with media- press conference of the findings of the review to assist in the publication of the findings.

Claire Morris  
Head of Business Services  
May 2024

# APPENDIX B

## 2024/25 guidance for lawful hunt and lawful protest activities

Warwickshire Police expects anyone involved in either lawful activity permitted by the Hunting Act 2004 or monitoring that activity to follow this simple guidance.

### Lawful Hunt related activities

1. Maintain accurate records including a map of where every trail is laid and a roster of attendees by contacting the Rural Crime Team ([ruralcrimeteam@warwickshire.police.uk](mailto:ruralcrimeteam@warwickshire.police.uk)). Provide a copy of the same map and roster to police 24 hours before riding out.
2. If the hunt goes off trail or control of hounds is lost, then the trail hunt is to be suspended immediately to reconnect with trail or control regained.
3. Take steps to ensure that no member of the hunt or hounds shall trespass on any land.
4. Not to block or cause disruption to the highway. When it is reasonably foreseeable that a disruption to the highway will cause local issues (such as larger meets, for example boxing day), make an application for a Traffic Management Order.
5. Not to allow hunt hounds to be loose in the vehicular carriageway and in such a manner as to be likely to cause a nuisance to road users.
6. To record any accidental kills and immediately inform Warwickshire Police either via 101 or contacting Rural Crime Team ([ruralcrimeteam@warwickshire.police.uk](mailto:ruralcrimeteam@warwickshire.police.uk)).
7. To provide any video or audio recordings made by hunt participants immediately upon request by Warwickshire Police, unedited.

### Lawful Protest

1. Take steps to ensure that no Hunt Monitor shall trespass on any land.
2. Not to block or cause disruption to the highway and to comply with the Public Order Act 1986 at all times.
3. Take steps to ensure that no Hunt Monitor shall act in a manner that is likely to cause a nuisance or annoyance to others when in a public or private place, this includes words or behaviour that are offensive, threatening or abusive and can be towards members of the public or police.
4. To provide any video or audio recordings made by protest participants immediately upon request by Warwickshire Police, unedited.
5. Maintain accurate roster of attendees. Provide a copy of the same roster to police immediately upon request to the Rural Crime Team ([ruralcrimeteam@warwickshire.police.uk](mailto:ruralcrimeteam@warwickshire.police.uk)).

## APPENDIX C

