

Part 5 - Dog team training

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Summary

Introduction

This part of the 'Police dogs' chapter outlines the policy and practice regarding the training of Police dogs and their handlers and includes:

- national training courses
- district training
- training methods
- training records
- training equipment.

Application

This chapter applies to all members of Police Dog Section and other Police employees who:

- have a Police dog
- have Police dog handlers or dog section employees reporting to them.

The Royal New Zealand Police College (RNZPC) policy

Dog Training Courses must comply with [RNZPC Training Delivery policies](#).

National standard

All Police dog handlers, Police dogs and Police dog teams must be trained to, and assessed against, national standards.

Training methods

Only **approved** training methods must be used to train Police dogs.

Application

Training standards, and methods of training, apply to all aspects of Police dog team training including:

- national training courses
- supervised district training
- individual dog team training
- any other formal training session
- informal training by groups or individuals.

Responsibility

The National Co-ordinator: Police Dogs must approve training and assessment standards and methods of training.

Definitions

Training related definitions

This table defines terms relating to training.

Term	Definition
Approved training method	Includes training methods described in policy and in training manuals. Training directed by a dog section supervisor or instructor that has been endorsed by the Practice Leader: Dog Training, the Dog Section Working Group or is acknowledged as an accepted and approved training method and meets the requirements of 'Training methods' described in this section.
Certification	The process approved by the National Coordinator: Police Dogs to ensure Police dog handlers, Police dogs and Police dog teams are competent for operational deployment.
Dog section supervisor	Includes any supervisor position in the dog section including trainers and instructors.
Dog team	One dog handler and one Police dog.
Instructor	A Police employee, or employee from any other organisation, appointed to manage and deliver training at the New Zealand Police Dog Training Centre in Trentham, or a Police employee who has been approved by the National Coordinator: Police Dogs to be a dog section instructor.
Operational	In reference to either a dog team, dog handler or Police dog means that they are certified as operational and are to do police duties.
Police dog	<p>In accordance with section 4 of the Policing Act 2008, 'Police dog' means a dog that is:</p> <p>(a) undergoing or has successfully completed a course of instruction at the Police Dog Training Centre; and</p> <p>(b) being used for Police duties.</p> <p>In terms of Police policy relating to the care and management of dogs it also includes a dog that is owned by Police or, in the possession or under the control of a Police employee or an authorised foster person for the purpose of being used by, or trained for Police for any authorised purpose.</p>
Police dog handler	In accordance with section 4 of the Policing Act 2008, 'Police dog handler' means a Police employee who is undergoing or has successfully completed a course of instruction at the Police Dog Training Centre that qualifies the employee to perform duties as a Police dog handler.
Qualification	A dog handler is qualified when they have successfully completed a training programme at the Dog Training Centre and qualified as an operational dog handler.
Trainee dog handler	Means a Police employee who is appointed to a position to train as a dog handler or is otherwise training to be a dog handler.
Trainer	Means a Police employee appointed as dog trainer in a district dog section.
Training day	Includes a working day or part of a day where a dog team undergoes planned continuation training.
Training session	Includes any period of time where a dog team trains.

National Dog Training Courses

National dog training courses are RNZPC courses delivered by the New Zealand Police Dog Training Centre in Trentham, in districts and other locations and including:

- national courses
- qualifying courses for dog teams
- advanced courses for dog teams
- refresher courses for dog teams
- staff training
- training conferences
- other training.

Purpose of courses

The purpose of courses is to:

- produce new dog teams
- develop the capability of operational teams
- provide refresher and continuation training for teams
- provide professional development opportunities for staff.

Qualifying courses

Qualifying courses include patrol and detector dog courses that qualify handlers or dog teams to operational standard and include:

- puppy, initial, intermediate and final course phases of patrol dog training programme
- detector dog courses for:
 - narcotic detection
 - currency
 - explosive detection
 - firearms detection
 - victim recovery.

Advanced courses

Advanced courses are for operational dog teams trained in another capability and include:

- training patrol dog teams in:
 - Tactical - Armed Offenders Squad - Special Tactics
 - Narcotic detection
 - Firearms detection
 - Search and rescue
 - Victim recovery
- training narcotic detector dog teams in firearm detection and or currency
- training detector dog teams in people searching.

Refresher training courses

Refresher training courses include specific refresher courses, or training opportunities on other existing courses or over part of those courses to:

- enhance or develop the capability and or efficiency of a dog team in a particular discipline
- provide continuation training opportunities for annual certification of dog teams.

Employee training courses

Employee training courses are provided for the professional development of staff and include:

- instructor and trainer training
- puppy development officer training
- opportunities for staff to observe, learn or practice current or new training practice.

Training conferences

Conferences and workshops are used to communicate and develop training practice, train employees and provide professional development opportunities for employees. This includes:

- trainers conference for Police employees
- trainers conference with other agencies.

Other training

Other dog team or dog training that may be initiated or undertaken.

Training delivery for courses

The Practice Leader: Dog Training at the New Zealand Police Dog Training Centre is responsible for delivering the curriculum of all courses and training programmes conducted by or under the control of the Dog Training Centre and for the assessment of dog handlers, dogs and dog teams.

Course structure and length

The Practice Leader: Dog Training is responsible for reviewing and adjusting course length and structure to ensure:

- efficient and effective training of dog teams
- best practice in training delivery
- achievement of course outcomes
- compliance with Police policy and practice.

Qualification of dog handlers

Dog handlers must be certified as operational on the successful completion of a course of instruction at the Dog Training Centre. Refer also to section [4](#) of the Policing Act 2008.

Certification of dog teams as operational

On achieving the qualification standard dog teams must be certified as operational in accordance with the ['Certification of Police dogs'](#) chapter.

Training and qualification of trainee dog handlers

Training Management Plan

A Training Management Plan will direct all phases of the initial training programme for patrol and detector dog training. The training management plan will be developed and approved in line with [RNZPC](#) and the Director: RNZPC.

Trainee dog handlers

All employees appointed to dog handler positions as 'Trainee Dog Handlers' must be trained and certified on national training courses conducted by the New Zealand Police Dog Training Centre in Trentham.

All trainee handlers must complete each of the formal course phases of training at the Dog Training Centre.

Replacement of dogs during training

When a handler's dog is replaced during the training programme, the decision as to what course(s) the handler needs to redo must be decided by the Practice Leader: Dog Training at the Dog Training Centre. The Practice Leader: Dog Training must consult with the handler's dog section supervisor prior to making that decision.

The only exception for a trainee handler to train in their home district is that:

- the replacement dog has been trained to or beyond a specific training course phase (such as the Initial or Intermediate course), and
- the trainee handler has successfully completed that phase of training with their previous dog, and
- a district trainer is able to deliver the training to the standards set by the Practice Leader: Dog Training
- the training complies with the Training Management Plan.

In considering the decision for a trainee handler not to redo a course that was completed with their previous dog, these factors must be taken into consideration:

- The ability of the district to provide the required level of supervised training to the trainee.
- The competencies that the handler is required to achieve, or were not achieved on a previous course.
- The availability of courses and or spaces on courses at the Dog Training Centre.
- The training needs of the trainee, and the best means for meeting those needs.
- The Training Management Plan.

Convenience, or the desire of a handler not to redo another course must not take precedence over the training needs of the handler or dog, in the decision making process.

Dog replacement process for trainees during training

This table shows the process steps to be followed for replacing dogs during a training programme.

Stage	Description
1	The Dog section supervisor recommends to the Practice Leader: Dog Training that the dog needs to be replaced and options are discussed and a course of action agreed.
2	A replacement dog is allocated to the handler.
3	The supervisor: <ul style="list-style-type: none"> - documents an assessment of the replacement dog - documents the ability of the district to deliver training - advises the Practice Leader: Dog Training and provides the documents above - discusses training options.
4	The Practice Leader: Dog Training determines what training courses are required and informs the supervisor and handler.
5	The Practice Leader: Dog Training implements and monitors the training.
6	The dog handler attends a final course.
7	The dog team receives certification.

Operational handlers training replacement dogs

Training Management Plan

A Training Management Plan will direct all phases of the re-training programme for operational dog handlers for patrol and detector dog training. The training management plan will be developed and approved in line with [RNZPC](#) and Training Approvals Committee policy.

Qualified handlers training or allocated a replacement dog must be trained or qualified on national training courses held at the New Zealand Police Dog Training Centre in Trentham.

The exceptions for operational handlers to train in their home district are:

- When qualifying with a replacement dog that has been or is operational.
- Multi-handling an operational dog.
- The replacement dog has been trained to or beyond a specific training course phase (such as the Initial, Intermediate Final course).
- The dog and handler can be trained to the required Initial and Intermediate level in district by a district trainer who is skilled in current training practice at that level.

The decision as to what course(s) the handler needs to do must be decided by the Practice Leader: Dog Training at the Dog Training Centre in consultation with the handler's dog section supervisor.

When considering whether a qualified handler needs to attend a course, these factors must be taken into consideration:

- Currency of the handler's knowledge relating to the management, training and deployment of a Police dog.
- The ability, behaviour and operational status of the dog.
- The ability of the district to provide the required level of training to the handler.
- The availability of courses and or spaces on courses at the Dog Training Centre.
- The needs of the handler, and the best means for meeting those needs.

- The ability of a handler to train a dog.
- The fact that the dog has been trained to or beyond the Initial, Intermediate or Final course level in district.
- The Training Management Plan.

Convenience, or the desire of a handler not to redo another course must not take precedence over the training needs of the handler or dog, in the decision making process.

Dog replacement process for operational handlers during training

This table shows the process steps to be followed for replacing dogs during a training programme.

Stage	Description
1	A replacement dog is allocated to the handler.
2	The <u>QC</u> District dog section or district trainer document: <ul style="list-style-type: none"> - documents the capability or stage of training of the replacement dog - documents the ability of the handler to train their dog and the training supervision available - advises the Practice Leader: Dog Training and provides the documents above - discusses training options.
3	The Practice Leader: Dog Training determines what training courses are required.
4	Training is delivered.
5	The dog team receives certification.

Operational handlers allocated an operational dog

Where an operational handler has been allocated an operational dog the dog section supervisor must consult with the National Co-ordinator: Police Dogs to determine:

- when and where the dog team can be certified and by whom
- whether the team require any specific training and by whom.

If the team needs to attend a dog training course the Practice Leader: Dog Training and dog section supervisor must determine what training will be done as in '[operational handlers training replacement dogs](#)' above.

Stage	Description
1	The operational handler is allocated an operational dog.
2	The supervisor consults with the National Co-ordinator: Police Dogs to determine what training or certification requirements are required.
3	The handler and dog train to certification standards.
4	The dog team is certified as operational.

Operational handlers multi handling an operational dog

Where an operational handler has been approved by the district OC Dog Section to multi-handle an operational police dog the dog section supervisor must consult with the National Co-ordinator: Police Dogs as to determine:

- when and where the dog team can be certified and by whom
- whether the team require any specific training and by whom.

If the team need to attend a dog training course the Practice Leader: Dog Training and dog section supervisor must determine what training must be done as in '[operational handlers training replacement dogs](#)' above.

All handlers multi-handling a dog must be qualified in deploying that type of dog. Each handler should complete four training days and the quarterly control assessments with the dog.

Stage	Description
1	The district dog section decides to multi-handle a dog.
2	The supervisor consults with the National Co-ordinator: Police Dogs to determine what training or certification requirements are required.
3	The handler and dog train to certification standards.
4	The dog team attains certification.
5	The handlers multi-handling dogs maintain quarterly training and control requirements.

Training methods

Policy statement

The training of Police dogs must be by appropriate methods that comply with the guidelines of these Police dog chapters and dog section training manuals. Training methods must be:

- lawful
- effective
- animal friendly.

Positive reinforcement

The primary method of training Police dogs must be by methods that use 'positive reinforcement'.

Physical correction

Physical correction should be the minimum necessary to produce the required effect by correct use of appropriate training equipment and training techniques.

Compulsion

Compulsion training is the use of methods designed to make use of the dog's natural instincts to compel it to perform a given command. It is recognised that in the training of dogs, there may be occasions when compulsion is required.

Punishment

Punishment means providing consequences for a behaviour that reduces the probability that the behaviour will occur in the future and includes:

- withdrawal of attention
- verbal reprimands
- physical punishment.

Physical punishment should be the minimum necessary to produce the required effect by correct use of appropriate training equipment and training techniques.

- If used, physical punishment should never cause any long lasting pain or discomfort.
- Harsh forms of physical punishment must not be used.

Training methods

The Dog Section Working Group must consider and identify suitable training methods.

Suitable methods must be approved by the National Co-ordinator: Police Dogs and communicated in training manuals, manual of practice or other forms of formal communication.

Where any Police employee wants to use a training method that is not readily accepted, identified or known as a current acceptable training method, they must seek approval from the National Co-ordinator: Police Dogs before using that method.

Mistreatment or abuse of dogs

The mistreatment or abuse of a Police dog is not acceptable. Mistreatment includes deliberately injuring a dog or doing any act to a dog that is cruel. It includes:

- kicking, punching or hitting a dog so as to injure it or attempt to injure it
- failure to provide the standard of care directed by a dog section supervisor
- failure to provide the standard of care identified in dog section training manuals.

All employees must report any instance of mistreatment of a Police dog to their OC Dog Section or the Practice Leader: Dog Training if the employee is attending a course.

The QC Dog Section or the Practice Leader: Dog Training must then commence an investigation into the matter and should be guided by the [Code of Conduct](#).

The National Co-ordinator: Police Dogs should be informed of any allegations of mistreatment or abuse of a Police dog.

District continuation training

Purpose

The purpose of continuation training is to:

- maintain the operational standard (certification standard) of dog teams
- increase or enhance the capability of operational dog teams
- achieve competence in new or variations of training, operational, or certification standards

and includes:

- informal training sessions conducted by the handler
- informal training sessions with other handlers
- formal training sessions or training days conducted by a trainer
- formal training sessions or training days conducted by the Dog Training Centre.

Annual continuation training days

Police dog teams should undergo a minimum of eight training days between annual certifications. The training days should be led by a dog section trainer or competent handler appointed by the QC Dog Section to conduct the training.

Length of training days

Each dog team should receive at least two hours training (including overheads) on a training day. The length of training days will generally be determined by the number of teams training and or the objectives of the training day.

Where it is not practicable because of operational requirements or other reasons to allocate or roster a training day, training sessions may be spread over a day or over a number of days to achieve continuation training requirements.

Training days should be flexible to fit around and respond to the operational and service needs of the district.

Training day curricula

Training days or training sessions for operational teams should be planned to enhance the capability of dog teams. They should also ensure that dog teams maintain operational certification standards in key competencies including:

- for patrol dog teams:
 - tracking
 - searching
 - apprehending - tactical options framework
 - safety and control
 - tactical deployment
 - SAR
- for detector dog teams:
 - searching
 - target odour recognition
 - safety and control.

Self led training

All dog handlers are required to use available opportunities during shifts and at other times to conduct their own training to ensure that they:

- maintain operational capability (efficiency)
- enhance operational capability
- maintain safety and control
- maintain the fitness of their dog.

Roles and responsibilities

Dog handlers

Dog handlers are responsible for maintaining the safety and control and efficiency of their Police dog in all disciplines and areas of operational capability.

Where safety and control cannot be maintained to the required certification standards at any time, or is in any way in doubt, handlers must inform their dog section supervisor as soon as possible.

Where efficiency does not meet certification standards, or is in any way in doubt, handlers must inform their supervisor as soon as is possible.

Dog section supervisors

Dog section supervisors must know the operational capability of all of their dog teams and be able to provide assurance to districts and the National Co-ordinator: Police Dogs of the safety and control, and efficiency of dog teams.

Dog section supervisors, trainers and instructors are responsible for providing continuation training opportunities for all dog teams in their district to deliver annual continuation training requirements.

Failure in safety, control or efficiency

When a supervisor is informed by a handler or becomes aware of a failure in safety and control of a dog team, they must take immediate steps to manage the situation in terms of the certification of Police dogs chapter.

Where a supervisor is informed by a handler or becomes aware of failure in efficiency they must implement a training programme with the handler or direct the handler to undertake specific training to resolve the problem. Refer '[Certification of Police dogs](#)' chapter.

Training records

Qualification records

Dog handler qualifications including academic records and dog team certification records are maintained in MyPolice and in the Dog Data Base by the Dog Training Centre in Trentham.

Training record

The training record is used to record formal training sessions, training days and quarterly assessments conducted as part of the annual certification processes.

Dog training records may be recorded in a training record book provided by the Dog Training Centre or in an appropriate electronic form that can be accessed by managers and supervisors.

The description of training in the record may be completed by the handler or the trainer involved, but must be signed off by the dog section trainer or supervisor who delivered the training. In the case of a handler appointed to deliver the training the training needs to be signed off by the dog section trainer or supervisor.

Description of training

The training record should record:

- time, date and place of training
- the trainer or supervisor who conducted the training (signed)
- a brief description of the training exercises carried out
- a brief description of the dog teams performance
- enough detail to allow a supervisor to understand what training took place and the outcomes of the training.

Note: The handler is still required to record the details of this training in their training diary as detailed below.

Certification Record

The Certification Record must be entered into the Dog Data Base. It is used by dog section supervisors to record the dates that continuation training, and safety and control assessments were delivered to a dog team and the date and outcome of annual certification. Refer: [Part 6 Certification of Police dogs](#).

Training diary

All dog handlers must maintain a dog training diary (hand written or electronic) to:

- keep track of the handler's professional performance and development
- keep track of the handler's dog's performance and training requirements
- assist handlers in planning effective training sessions
- enable supervisors to monitor the performance and training requirements of dog teams
- provide evidence in court of the competence of a dog team.

Content of training diary

The training diary must record all dog team training conducted by the handler or delivered to the handler and their dog, including:

- training on national courses
- district continuation training
- training that may already be included in the training record book
- self directed training.

Description of training

The training diary should record:

- time, date and place of training
- whether the training was self-directed or supervised and by whom
- the objectives and outcomes of training
- the training exercises carried out
- description of the dog's behaviour
- diagrams and environmental conditions (e.g. sketch of a track)
- enough detail to allow a supervisor to understand what training took place and the outcomes of the training.

Inspection of training diaries

Training diaries must be available for inspection by a dog section supervisor or trainer whenever a handler is on duty, or attending a training course.

Inspection of training and certification records

Training and certification records must be available for inspection and for entries to be made by a dog section supervisor or trainer whenever a handler is on duty.

These must also be made available for inspection and entry by a dog section assessor whenever a team is undergoing annual or any other certification.

Annual continuation training requirements

In addition to assessment standards and performance criteria identified in training manuals, qualification standards and certification standards, the National Co-ordinator: Police Dogs will identify additional or specific training requirements that dog teams are required to train to and or be certified in.

The National Co-ordinator: Police Dogs must consult with the Dog Section Working Group when setting those requirements.

Training equipment

Policy

All equipment used on or with Police dogs should be appropriate for the training to be undertaken and used by employees who are trained in its use. The categories of equipment in this practice are:

- dog handling equipment
- protective equipment
- toys
- detector dog training aids
- electronic collars.

Regular inspection

Handlers and supervisors must regularly inspect equipment to ensure that it is in good condition and safe to use. Worn equipment that could fail during training or daily or operational use, must be replaced as soon as possible.

Dog handling equipment

Dog handling equipment includes leads, collars, harnesses and check chains. This equipment is designed and tested for function and safety before it is approved for use.

Approved equipment

Only dog handling equipment that has been approved by the National Co-ordinator: Police Dogs must be used on a Police dog.

When staff require new equipment to be approved they must put the request in writing to the National Co-ordinator: Police Dogs. The National Co-ordinator: Police Dogs will manage the testing and approval process for new equipment.

Protective equipment

The training of Police dogs, in particular bite work training, involves physical risk to the health and safety of staff. It is imperative that protective equipment is available to be worn. This includes:

- protective sleeves
- bite suits
- scratch pants
- muzzles.

Toys

Toys used for play or positive reinforcement include:

- bite roll
- kongs
- balls.

All toys must be of a suitable size and material to ensure that the risk of a dog swallowing the toy or part of the toy is minimised.

Detector dog training aids

The care and storage of detector dog training aids must ensure that:

- the training aid is not contaminated by other smells or substances
- the security and integrity of the training aid is maintained.

Electronic collars

Electronic collars include those that work by emitting:

- an electric shock
- a spray or sound.

Use of electronic collars

Electronic training collars may be an effective training aid for training Police dogs when used appropriately and by staff trained in their use. The circumstances when they can be used are where:

- traditional positive reinforcement methods of training have been correctly used and are unsuccessful
- the use of other forms of correction, compulsion or punishment would be harsh and not comply with Police dog training standards
- the behaviour is such that the dog will need to be withdrawn from training or service if the behaviour cannot be modified.

Training collars do not replace good training practice or to solve poor or inadequate training practice, or as a 'quick fix' where training of or responses in a dog has not been maintained.

Training collars cannot be used during operational deployment or any certification, or immediately before (including any time on the day) a dog team is certified.

Who can authorise their use

In consultation with the National Co-ordinator: Police Dogs, only the QC Dog Section, dog section supervisors or the Practice Leader: Dog Training can authorise the use of electric collars. In the case of dog teams training on a national course or to a national qualification the instructor or Practice Leader: Dog Training can authorise the use of an electronic training collar. The use of the electric collar must be followed by a report notifying the National Co-ordinator: Police Dogs.

Decision to use an electronic training collar

The decision whether or not to use an electronic collar must take into consideration:

- the exact behaviour that needs to be modified
- training that has occurred to date
- the skill of the trainer or handler in delivering that training
- whether training methods meet current practice standards
- the qualities and nature of the dog.

Procedure

Step	Action
1	Speak to the handler to define the problem and identify what may have caused it.
2	Examine the handlers training diary to identify other training or behaviour that may have caused or contributed to the problem.
3	Discuss with other trainers and or the Practice Leader: Dog Training.
4	Consider alternatives and options.
5	Determine best option and plan implementation.

Continued use of electronic collars

If an electronic collar is still being used after six months, then the decision making and reporting process in this good practice must be reviewed.

Use of an electric training collar

Inappropriate use, or incorrect use of an electric training collar can cause irreparable damage to other trained responses, or the potential of a dog to be used for policing work.

The use of the collar must be carefully planned and used by a skilled trainer to ensure:

- equipment is in good condition and working order
- the trainer runs and controls the training session
- all participants know their role, have a communication plan and know the exact interaction that will occur with the dog (stimuli, commands, correction and praise)
- the collar is only used at the minimum level that produces a response from the dog
- continuous stimuli from the collar is not used.

Electric bark collars

The use of a bark collar may be an effective means to stop uncontrollable barking in kennels and dog vans, aggression towards other dogs in those environments, and the loss of energy of a working dog caused by it constantly barking in a van or kennel.

The decision to use an electric bark collar should be based on the same decisions as for use of electronic collars.

It is acceptable practice for a dog to wear the collar in kennels, or in the back of a dog van as long as the dog is regularly checked on. However, a dog must not wear the collar when on the lead or away from the kennel or van where the dog should reasonably be expected to bark in response to an environmental stimuli or a trained response.

Take extreme care that the dog understands the trained response to 'speak' and the use of the collar does not inhibit the training required of a police dog.

Reporting

The use of an electric training collar must be recorded by dog section supervisors and statistics on use reported to the National Co-ordinator: Police Dogs as required.

Dog handlers must record the use of an electronic collar or training device in their training diary (in the same manner that other training is required to be recorded) on every occasion that it is used.

All course reports and verbal reports prior to certification must identify the fact that a collar has been used, the reason and the outcome.

Pinch collars

Pinch collars must not be used. Pinch collars are collars or choke chains that have metal prongs that dig into the dog when tightened. The Animal Welfare (Dogs) Code of Welfare 2010 banned the use of pinch or prong collars under Minimum Standard No. 19 - Aids for behaviour modification.

Supply of equipment

Equipment is supplied to districts through the Police supply system or directly from manufacturers and suppliers. If equipment is not listed in the SAP system staff should contact the Dog Training Centre who will advise on what equipment is approved and who the supplier is.

Testing and approval of equipment

All equipment must be tested to ensure that it is fit for purpose and approved for use by the National Co-ordinator: Police Dogs.

Any equipment used to control a Police dog or used to provide safety to a Police dog must be tested and approved before it can be used for general use.

Trialling equipment

Equipment that is being tested and evaluated may be issued to specific staff for the purpose of trialling. Before being trialled the equipment must have been assessed or tested for strength and durability through this process.

Stage	Description
1	Equipment identified or designed.
2	National Co-ordinator: Police Dogs identifies suitable person to manage project.
3	Equipment tested for strength and durability.
4	Equipment trialled.
5	Report provided to the National Co-ordinator: Police Dogs for tabling with the dog section working group.
6	Dog section working group reviews equipment and makes recommendation.
7	National Co-ordinator: Police Dogs implements decision.

s.6(c) OIA, s.6(d) OIA

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