Response by the British Transport Police and the British Transport Police Authority to “Policing of the Railways in Scotland – A case to support the Integration of the British Transport Police within the Police Service of Scotland”

PART A - The position of the British Transport Police (BTP) in Scotland

The British Transport Police has a long history of operating in Scotland, where it boasts a successful performance record and enjoys a strong relationship with the Scottish Authorities and the Police Service (with both Police Scotland and its predecessors). The BTP operates across Britain because several government and independent reviews carried out over the years have concluded that the travelling public is best served by one national police force for the railways.

‘the national railway network is best protected by a unified police force providing a dedicated, specialist service and able to give proper priority to the policing of the railways’
(UK Government, 2001)

There is nothing to suggest that this has changed; indeed with an expanding rail network carrying more passengers and freight than ever before it is imperative that Scottish passengers and rail industry continue to receive a world-class specialist policing service. There has been a significant reduction in crime and disruption on Scotland’s railways since 2008-09, helping to make the network safer, more reliable and attractive for commuters. The BTP’s 2013-19 Strategic Plan objectives are focused on continuing this success and the BTP is committed to working closely with colleagues in Scottish Government and Police Scotland to deliver an excellent police service. The BTP is open to engage with colleagues in Transport
Scotland and the Scottish Government to discuss ways to improve the provision of transport policing in Scotland. The BTP is acutely aware that the Scottish Government is a principal funder of BTP’s Scottish Area and as such feel they should have an appropriate level of influence over the BTP’s policing priorities and organisational objectives and that the BTP’s strategy is aligned with that of the Scottish.

Both the Government and independent bodies have comprehensively reviewed the BTP four times since 2001 – more than any other police force in the country. All reviews have been unanimous in their conclusions: the BTP is efficient and effective and provides a policing service that should be kept as a specialist and separate force for the whole of the British railway network.

In 2001, the Government response to a consultation by the Department for Transport (DfT) which ultimately led to the creation of the British Transport Police Authority (BTPA) (‘Modernising the British Transport Police’) stated that:

“The Government therefore considers that the national railway network is best protected by a unified police force providing a dedicated, specialist service and able to give proper priority to the policing of the railways.”

In 2003, HM Inspectorate of Constabulary reviewed the Force and found good relationships with the industry and historical support from the industry and the Government. It concluded that:

“...the enforced amalgamation/merger of the whole or part of the British Transport Police with one or all Home Office Police Forces would unquestioningly lead to a dilution of the specialist service given to the rail industry and its public users and, most probably, would lead to a significant
reduction in the number of police officers and police staff left to police the network.”

In 2004, the Transport Select Committee looked at the reforms to the BTP’s governance arrangements, including the creation of the BTPA, proposed by government. It concluded that:-

“The British Transport Police is not a Home Office Force, and nothing we have heard suggests that it should become one. The railways are a specialised environment, with specialised needs, and need a specialised Force…”

and:-

“The steady reduction of resources allocated to traffic policing leads us to agree with Her Majesty’s Inspectorate of Constabulary that unless there is a national force dedicated to policing the rail network, the task will not be given the priority it needs”

The government’s response to the Committee’s Report stated that:

“The Government agrees with the Committee that the national railway network is best protected by a unified police force providing a dedicated, specialist service and able to give proper priority to the policing of the railways. The White Paper re-iterates the Government’s support for the BTP continuing as a specialist police force with a key role to play in maintaining safety and security on the railway”

And also:-

1 HMIC (2004): British Transport Police – A report by Her Majesty’s Inspectorate of Constabulary
“The Government fully agrees with the Committee that the BTP has a key role to play in maintaining safety and security on the railway. The specialist skills that the Force has established in areas like incident management, counter-terrorism and policing travelling football supporters provide real benefit to the railway industry and the travelling public. The BTP perform their duties whilst recognising the commercial environment that they work in. The Force also has a well-regarded approach to risk management, highlighted by its established bomb-threat categorisation. As the White Paper makes clear, the Government supports the BTP continuing in its role as a specialised rail police force.”

In July 2004, the Government considered the BTP in its White Paper ‘The Future of Rail’, which stated:

“The BTP have a key role to play in maintaining safety and security on the railway. The industry and passengers also receive significant benefits from a dedicated force, particularly from its approach to managing incidents, which is aimed at minimising delay. The Government confirms its support for the BTP continuing in its role as a specialist rail police force.”

The DfT then looked again at the BTP post-implementation of the creation of the BTPA, reporting in September 2004. This concluded that:

“The British Transport Police have a key role in maintaining safety and providing public reassurance on the railway network. The specialist service that the BTP provides brings significant benefits to the industry and to the travelling public.”

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4 DfT (2004): The Future of Rail, paragraph 3.3.14
5 DfT (2004): Review of the British Transport Police
public. The BTP’s ability to police in a commercial environment, and to manage risk, provides the industry with considerable cost-savings. Likewise passengers are able to benefit from the sensitive way that the BTP police the railway network and from the re-assurance that the Force provides”

And also:

“Given this support for a specialist rail police force, there is no suggestion that the BTP should be merged or linked to the Metropolitan Police or other Home Office County Forces. To do this would be to lose the valuable specialisms that the BTP has established. It would also take away the extremely positive ability of the BTP to police across boundaries.”

The reviews also highlighted aspects of the BTP which were seen as essential for providing an effective specialist police service. These are still relevant and, given the rate of expansion that the railway is currently undergoing, increasingly important. The BTP’s commercial awareness is regarded as a key component of a ‘transport policing ethos’: an approach that runs through all of its operational activity and significantly enhances the service the railway receive. The BTP is highly conscious of the consequences of delaying trains on the network, not only to the train specifically involved in an incident, but to those further up or down the line which could be affected. This is perhaps best evidenced in the BTP’s approach to fatality management which has been developed in close partnership with the railway industry and allows officers to deal with a situation as efficiently as possible without necessarily declaring a crime scene. As well as this, the BTP’s approach offers much more such as the setting of Force and Area performance targets, preventative analysis, body retrieval strategies and categorisation processes, PIER
(Prevention, Intelligence, Enforcement and Reassurance) plans, which set out agreed actions in relation to vulnerable people and locations, and engagement and agreements with the coroner’s office and Procurator Fiscal. The BTP’s position within the policing family, its national accreditation and its ability to use warranted powers enable it to coordinate and oversee an investigative approach which is best suited to keeping disruption on the railway to a minimum.

The BTP champions initiatives which are of special importance to the rail industry. One good example concerns fatality management. The BTP created specialist teams with responsibility for the management of multi-agency support for local and national suicide prevention, mental health interventions and vulnerable persons encounters. There are three teams based in London, one working from Force Headquarters and two Public Protection Units covering the London North and London Underground Sub Divisions. These teams work closely with Network Rail and Samaritans on the National Suicide Prevention Steering Group, a forum which sets strategic objectives to minimise the number of deaths on the railway through suicide. A target of a 20% reduction over five years from 2009 - 2014 has been set by the Steering Group and BTP are on track to achieving this reduction. An ongoing force-wide operation (Operation Avert) has so far achieved a 30% reduction in suicide attempts compared to the same period the year before.

Specialisation is also critical when it comes to bomb detection. BTP has established a graded response approach for the assessment of unattended items and bomb threats. The success of this approach is unrivalled by any other organisation in the world. The London bombings on 7 July 2005 were unprecedented in terms of the number of people killed and injured in railway related attacks, and the BTP’s expertise and specialist knowledge of the railway environment clearly showed that it has an integral and crucial role in policing Britain.
In the aftermath of the London bombings, BTP ensured that King’s Cross mainline station was reopened later that evening, allowing people to carry on with their lives. The industry was unanimous in their praise of the BTP’s response and assistance in getting the network running as soon as it was viable. This helped curtail industry losses to a minimum (thought to be in the region of £20m). The Association of Train Operating Companies (ATOC) noted that:

“The train operators have a very high respect for BTP, underlined by their performance in the recent terrorist incidents. We place a high value on this specialist force and their unique knowledge and skill in policing the railway.”

Over a ten-year period, records show that of 2.5 million unattended items assessed by rail staff using BTP procedures, all but 36,000 were immediately eliminated as not suspicious. BTP officers assessed those not eliminated. None of the items found were explosive devices, and major station closures were averted. It is estimated that the cost of a temporary closure of station is in the region of £2m. Since 1992, BTP has assessed almost 10,000 threat messages. Of these, only 53 led to large-scale evacuation with approximately 50% linked to an explosion or the discovery of a bomb.

To reflect the national rail network, BTP is not constrained by the geographic boundaries of other police forces or legal frameworks, which the rail industry cuts across. Our boundaries cover the total policing environment of the British rail network. The structure of the BTP provides a single point of contact and consistency in policing standards across the English, Welsh and Scottish railways. Our policing model means we seamlessly police the British network and the London Underground in an intelligence-led and targeted way. The BTP works across two legal systems and has a number of BTP police officers have completed the legal formalities to operate in
England, Wales and Scotland. As the BTP is responsible for policing the whole network, it does not matter where the crime happened. If other forces became responsible, some debate is likely over who would investigate crimes, which would be distressing for victims and cause unnecessary delay.

Without a national railway force, crime is likely to go undetected causing dissatisfaction and concern over the safety of using the rail network. This would have significant consequences for the rail industry. Having multiple police forces looking after the rail network would mean that the rail community would have less influence on policing. Funding arrangements would be more complex, and the commercial interests of the industry are not likely to be afforded the same level of priority. There would be confused accountability for cross-border policing and ownership of crimes, with no single point of contact for the industry or passengers. In formulating policy, and in developing our six-year Strategic Plan and Policing Plans, the BTP and the BTPA have taken into account British policing priorities and consulted extensively with the railway community. The BTP understands the importance of striking a balance between national aims and commercial needs; this is unlikely to continue if there is any change in who polices the network.
PART B - The Scottish Government’s Integration Business Case – Detailed Commentary

Below are the comments to the specific points made in the case to support the integration of the BTP within the police service of Scotland.

1. **Background (Paragraphs 1.1 – 1.4)**

1.1 Although the reductions in crime levels across Scotland as a whole are acknowledged in this section, there is no reference to recent achievements in reducing crime on the railways. As the specialist police force for the railways, the British Transport Police (BTP), in partnership with the former eight Scottish forces, Association of Chief Police Officers Scotland (ACPOS) and railway operators in Scotland, has reduced crime on the Scottish railway network by 56% since 2005 (compared to a reduction in crime of 38% across Scotland nationally).

1.2 The business case acknowledges that the BTP is a respected police force that delivers a high quality service, supports the railway service and proactively ensures the safety of those who use the network. It claims that, since the formation of Police Scotland, the operations of the BTP in Scotland are in an ‘incongruous’ position. This is strongly disputed; the BTP is widely regarded as an essential element of the overall policing provision for Scotland and that there is no incongruity in its position as a specialist railway policing service.

1.3 The business case does not acknowledge that the BTP’s specialist approach and acute understanding of the requirements of passengers, staff and railway operators - developed from generations of engagement with the railway operators - have ensured that passengers on Scotland’s railways are more confident about their safety on trains and stations than anywhere else in Britain (as measured by the
National Passenger Survey). There is no evidence presented in
the business case of an appetite to change policing
arrangements from either passengers or from those operators
who fund the BTP through the longstanding ‘user pays’
arrangement.

2. **Context (Paragraphs 1.5 – 1.9)**

2.1 The business case rightly acknowledges that UK passengers
expect a seamless operation across the railway network
(paragraph 1.5) and the statistics used in paragraph 1.8 show
that over 21 million journeys are made between England and
Scotland each year. Clearly, any fracturing of railway policing
could potentially lead to a less cohesive passenger
experience with no one force able to operate with a cross
border capability. The business case also states that the public
will expect BTP officers to be under the command of police
Scotland. There is no evidence to support this statement,
indeed the record levels of passenger captured by the National
Passenger Survey both in Scotland and in England and Wales,
would suggest that the current model of policing positively
impacts on the travelling public’s perceptions of safety and
security.

3. **Timing (Paragraphs 1.10 – 1.12)**

3.1 The business case states that ‘the time is right’ to consider the
BTP’s position in Scotland and cites the Triennial Review of the
BTPA, the BTP’s internal structural review, and a Home Office
review of the BTP’s statutory powers as evidence that there is
wider support for change. This is an incorrect line of argument
however, as all the three of these reviews have emphasised the
need for a specialist policing service for the whole railway
network, and any recommendations are focused on how the
BTP can provide this service more effectively in the future.
This conclusion has also been supported by all government-led reviews in the last ten years. The timing of the business case should also be seen in the context of the BTP’s 2013-19 Strategic Plan that has ambitious objectives to reduce crime on the railway by 20%, reduce disruption by 20% and increase passenger, staff and stakeholder confidence by 10%. To disrupt the BTP’s organisational plans to achieve these targets at such a critical time in the Plan would not be in the best interests of the railway. The BTP’s organisational restructure, that has increased frontline resources by nearly 200 officers through a reduction in back office costs is also due to be implemented in full in April 2014 adding to the potential disruption that would be caused by these proposals. It is therefore difficult to understand how the timing of these events in any way supports the proposal for merger.

3.2 It is important to note that the current work on legislation and jurisdiction being carried out by the BTP and the Home Office that is referenced in this section is focused on addressing those instances where the BTP’s operational effectiveness is undermined or where its officers are put at unnecessary risk by unintended legislative anomalies. There is no question of the BTP’s specialist focus being diluted or diverted from railway policing as a result of this work.

4. Improved Accountability (Paragraphs 2.1 – 2.3)

4.1 There is a factual error in this section in that the Chief Constable of the BTP is based in London, not Birmingham. It should also be noted that the BTP’s Assistant Chief Constable (Scotland) and Chief Superintendent (Scottish Division) are both based in Glasgow. However, there is also a wider point; the business case is mistaken in arguing that Police Scotland’s officers are somehow more accountable than BTP officers. In
fact, Chief Constable of the BTP is as accountable as the Chief Constable for Police Scotland under law and BTP officers are accountable in the same way as their Police Scotland colleagues. The brigading of the BTP into a Police Scotland transport division would not enhance accountability in any way. It could indeed be argued that the opposite would be the case and that the accountability of the police service to passengers and rail operators would be diminished if such a move were to take place as there would be a less direct relationship between the police and the rail industry.

4.2 Currently the BTP, as a specialist force, is accountable to its Police Authority whose members represent the interests of both passengers and rail industry. This direct accountability ensures that the approach to policing on the network is sympathetic to the expectations of stakeholders. Awareness of local needs and priorities is also well evidenced, with train operator managers and senior BTP officers enjoying good working relationships. These generate and promote mutual understanding, partnership working and also facilitate quick intervention to be made by either party if performance or responsiveness is not at a required level. In terms of relationship with Scottish authorities, the BTP's Assistant Chief Constable (Scotland) and other senior officers are held to account for the performance of the BTP in Scotland and for the actions of the officers under their command to the Scottish Parliament and Government. Through Transport Scotland, the Scottish Government is able to influence the process of setting BTP priorities and operational objectives in Scotland. If railway policing was carried out as just one of a number of responsibilities of a much larger organisation it is likely that
passangers and industry will lose the influence and responsiveness that it so values.

4.3 It is acknowledged within the business case that all officers uphold the values within the Scottish code of ethics based on Fairness, Integrity and Respect. The Scottish code of ethics was developed with close engagement with the ACPO national lead for ethics, Chief Constable Adrian Lee, and there is no material difference between the standards expected of Scottish officers and those of their English and Welsh colleagues.

4.4 As well as upholding national standards of ethics, BTP officers display behaviours which underpin the organisation’s commitment to the delivery of a safe, secure, reliable and expanding transport system. For example, BTP officers are responsive and customer focused, recognising the impact of their actions and assisting industry colleagues to minimise disruption to the railways. They are strong risk managers, often making critical decisions using evidence based methodologies and are committed to service recovery, without compromising their duty to protect and serve the public. These behaviours are important to the industry and are routinely exercised in a way that is entirely consistent with the police service’s code of ethics both in Scotland and in England and Wales. There seems to be no basis for the incorporation of specialist railway policing within a division of Police Scotland on grounds of ethics.

5. **High level of containment (Paragraph 2.4)**

5.1 It is highly unlikely that mutual aid between forces would make ‘greater operational sense’ than the seamless cross border policing arrangements that exist now. It is essential that Britain’s railways are policed in a manner that is not
constrained by the geographic boundaries of other police forces or legal frameworks that the rail industry cuts across. The BTP’s boundaries cover the total policing environment of the British rail network and the structure of the BTP provides a single point of contact and consistency in policing standards across the Scottish, English and Welsh railways. The BTP successfully works across two legal systems and has a number of BTP police officers sworn-in in both England and Wales, and Scotland. The ability to police across two legal systems is important in day-to-day terms. When a crime or disorder occurs, often the exact location of the incident cannot be pinpointed. As the BTP is responsible for policing the whole network, it does not matter especially where the crime happened. If other forces became responsible, some debate is likely over who would investigate crimes, which would be distressing for victims and cause unnecessary delay.

5.2 This remains the case in Scotland notwithstanding the creation of Police Scotland. As noted above, 25% of Scottish passenger travel is made between Scotland and England; over 21 million journeys a year. Without a specialist British railway police force, there could potentially be confused accountability for cross-border policing and ownership of crimes, with no single point of contact for the industry or passengers. Crime may go undetected causing dissatisfaction and concern over the safety of using the rail network. It could also lead to confused accountability for cross-border policing and ownership of crimes with the lack of a single point of contact for the industry or passengers.

5.3 An example of the regular type of cross-border travel that is now policed seamlessly by the BTP is the policing of Newcastle United FC supporters from points across Scotland down to Newcastle (and back) during home matches. This is
coordinated between the BTP Scottish Area and North Eastern Area and takes account of the need to control public space and provide a visible presence. A further example is the policing of the last service trains leaving Carlisle for Dumfries and further north. These are policed in operations by the BTP’s Scottish Area and North Western Area, reassuring staff and the travelling public. This joined-up method of policing, highly valued by the railway industry and passengers, may not occur in such an organic manner if Police Scotland policed Scotland’s railways. It should also be noted that the business case does not consider the risks posed by forthcoming major events such as the Commonwealth Games, the Ryder Cup and the Rugby World Cup events in 2015, were the policing of the railway to become the responsibility of multiple police forces.

5.4 Fragmentation of railway policing could have significant consequences for the industry. Funding arrangements would inevitably be more complex, and the commercial interests of the industry would not necessarily be given the priority they are today. In formulating policy, and in developing the current six-year Strategic Plan and annual Policing Plans, the BTP take into account British policing priorities and consult extensively with the railway community. The BTP understands the importance of striking a balance between national aims and commercial needs; this level of understanding may not continue if there is any change in who polices the network.

6. **Diminished Rationale (Paragraph 2.5)**

6.1 As stated above, the current work on legislation and jurisdiction being carried out by the BTP and the Home Office is focused on addressing those instances where the BTP’s operational effectiveness is undermined or where its officers are put at unnecessary risk by unintended legislative
anomalies. The business case does not seem to account for the fact that there will always be different jurisdictional and legislative powers between Scottish forces and those in England and Wales simply because there are different legislative frameworks. As stated above, the BTP successfully works across these two legal systems and a number of BTP police officers have completed the legal formalities to enable them to work on both sides of the border. The Scottish Government’s proposals to brigade the BTP’s Scottish Area within Police Scotland would mean that there would be no single force able to operate with this seamless cross border capability, meaning that policing of the rail network would be fractured and arguably less effective.

7. An integrated approach to Transport Policing (Paragraph 2.7)

7.1 Although there may be some opportunity to bring together the policing of the strategic transport network in Scotland, as well as in England and Wales, it is of note that this concept, even without the inclusion of railway policing, was not considered in the formative plans for Police Scotland or even suggested via the Scottish Government’s public consultation on the formation of the new structure. It is highly unlikely that the required level of training and focus provided to BTP officers could be replicated in an organisation with a remit as broad as that of Police Scotland as is suggested in the business case.

8. Public Benefit (Paragraph 2.8)

8.1 This section makes the case for increased public benefit in two areas, command and accountability. As acknowledged in the business case, relations between the BTP and Police Scotland are excellent and there are no problems reported in coordinating police responses to incidents and command
arrangements. In regard to command integration, a fracture in policing responsibilities could affect the movement of passengers and freight across the British network. In terms of accountability, as stated above, there seem to be no grounds for brigading the BTP under Police Scotland.

9. Clearer and Simpler Control and Response Arrangements (Paragraph 2.10)

9.1 As stated above, the command arrangements that exist between the BTP and Police Scotland work very well and there is no evidence that the proposals put forward by the Scottish Government would bring about practical improvements in operational policing. The cross border functionality of the BTP allows all movements across the railway network to be policed in a manner that is not constrained by the geographic boundaries of other police forces or legal frameworks that the rail industry cuts across.

10. Benefit for BTP Officers (Paragraph 2.11)

10.1 The claim that our officers would benefit from the integration of the BTP within Police Scotland is not evidenced. Indeed, the argument put forward that BTP officers would enjoy a greater ease in moving outside of their specialism underlines the risk to the railway in losing officers with the requisite specialist skills and experience necessary to police that unique environment should these proposals be implemented. It is important to note that the BTP officers in Scotland are able to operate in the full context of Scottish law and procedure. Like officers of Police Scotland, BTP officers in Scotland are agents of the Procurator Fiscal and report to and can be instructed in exactly the same way as colleagues from Police Scotland. BTP Scottish officers undergo training alongside Police Scotland officers at the Scottish Police College and the BTP’s promotion
qualification process in Scotland is the same as that in Police Scotland. BTP civilian staff are of the highest calibre and have achieved recognition at all levels - from recruits passing out top of the Scottish Police College for the past three years (receiving the Baton of Honour and Scottish Police Federation Trophy for the most outstanding student) to dedicated and professional service being recognised in Her Majesty's annual Honours Awards. The BTP takes pride in developing its staff through a range of opportunities such as secondments to industry partners and a range of government agencies. Many BTP officers have taken, and continue to take, the opportunity to be seconded to the former Scottish forces and the new Police Scotland and the BTP has had several officers seconded full time as trainers at the Scotland Police College, often in specialist areas such as covert policing and the Scottish Crime and Drug Enforcement Agency and its predecessor, the SDEA. The BTP currently has Sergeants seconded full-time at Police Scotland custody suites in Glasgow and Edinburgh and will shortly be seconding officers to Police Scotland's Domestic Abuse Unit in Glasgow. The BTP has also provided assistance to major investigations in Glasgow through the secondment of officers fluent in foreign languages. Opportunities for BTP officers to expand their policing knowledge out with the BTP exist at present and the excellent relationship between the BTP and Police Scotland results in a situation where officers of all forces can benefit from a secondment to the other. Although the Scottish Government's business case puts forward the argument that BTP staff would benefit from a loss of specialist focus and a move to an organisation with a broader remit, this unlikely to be the case.

10.2 BTP officers are trained and experienced in the specialist skills that are required to operate every day in a dangerous
environment, such as working near electrified tracks, continuity planning and station evacuation. They are comfortable in managing without necessarily having direct authority and are trained to grip situations immediately that can have critical implications for the operation of the railway such as cable thefts and fatal incidents. Diluting this capability would negatively impact on the morale of BTP officers and could be argued to be to the significant detriment of the safety and security of passengers and the efficient operation of the railway.

11. Financial Opportunity (Paragraph 2.13 – 2.15)

11.1 There would be financial implications both for UK railway providers and for the Scottish Government if the proposals within this business case were adopted. The BTP’s revenue budget is set by the British Transport Police Authority (the BTPA) using a number of factors, most notably crime data, train kilometres, station usage, network access data and BTP officer duty states. Using an approved model, the BTPA charges each train and freight operator, and Network Rail, a percentage of the overall budget.

11.2 For Scotland, the direct charges under this model are £12.6m. However, these costs are augmented by what are know as head office charges which are allocated across all of the BTP’s Areas on the basis of staff and officer numbers in that Area. These costs pay for non-geographic functions such as Territorial Policing, Central Operations, Corporate Resources and Technology. Practically these departments provide the infrastructure necessary to run a national police service and also central operational policing resources such as major crime, counter terrorism, Special Branch, events policing, training, dogs units and major incident response. The total charge
allocated to Scotland in this area is £9.2m. Were the BTP’s Scottish Area to be brigaded within Police Scotland, this amount, with minimal exception, would need to be reallocated to those operators running services within England and Wales.

11.3 There would also be implications in terms of pensions. Although a specific actuarial valuation would need to be carried out in order to understand precisely the position in Scotland with regard to the range of pensions schemes that BTP officers and staff contribute to, any deficit would need to be carried over as a liability for the Scottish railways in the event of the BTP’s Scottish Area transferring to Police Scotland.

11.4 The BTP does, however, recognise that, as the major contributor to Scottish Area budget that it is appropriate that they are considered a major stakeholder and engaged with as such. As noted above, regular engagement does take place, but the BTP would welcome the opportunity to discuss how this could be built on in future if it is seen as an area that could be improved.

12. Impact of Integration (Paragraphs 3.1 – 3.3)

12.1 For the reasons outlined above, it is not considered that the impact of the proposals would be ‘minimal’ even if existing relationships and standards were maintained. The loss to Scotland of specialist railway policing provision would be very likely to have significant economic, crime and security implications. The proposal to use Scotland as a ‘test bed’ for an integrated policing solution is not supported by any evidence as to how this would work or how it would be progressed and, in any case, would be better implemented with the support the BTP’s Scottish Area rather than brigading this provision into Police Scotland. Again, for the reasons
outlined above in this paper, the claim that these proposals would ‘strengthen [the] delivery of a good passenger focused service’ is unfounded.

13. **Stakeholder Opinion (Paragraphs 4.1 - 4.4)**

13.1 The BTP has excellent relationships with train operators and other police forces within Britain. Although the Scottish Government’s business case acknowledges this, it fails to mention that during the consultation period there was significant opposition from industry stakeholders to its proposals. It seems highly unlikely that the service level agreements proposed by the business case between the police and industry would be sufficient to secure the current policing service and be deemed a success either by the service providers or the service users. Policing of the railways would be in danger of becoming subsumed with the many everyday demands placed on Police Scotland and the specialist and dedicated policing currently in place could diminish over time to the detriment of the public and the economy.

14 **Next Steps (5.1 – 5.3)**

14.1 The BTP is acutely aware of the importance of Scottish Government as a stakeholder and representative body and is very keen to engage to understand any concerns they have with the BTP and how they can be addressed. Although, as outlined above, a very good model exists for consulting with Transport Scotland and Members of the Scottish Parliament, any suggested improvements that could be made to this structure would be very welcome. The BTP continues to be wholly committed to continuing the very good working relationships it has with Police Scotland and the Scottish train and freight operators.
14.2 Ultimately, the BTP provide a policing service that delivers a safe environment for the public where criminality is prevented and offenders brought to justice. There have been improved cross border passenger and freight services in Scotland over the last decade with greater frequency, strong growth and major investment. Any move that could undermine these achievements and risk the investment made by governments and industry by endangering the seamless provision of policing services is likely to be strongly resisted.